AIR PA/DB0378S/
RN100788959/7711A/PA

PERMIT APPLICATION ROUTING AND SUMMARY SHEET
AIR PERMITS

This sheet should accompany all notices to be processed by the office of the chief clerk on the left side of the file folder.

NAME OF APPLICANT: ..... Building Materials Corporation of America	
FACILITY/ SITE NAME: ..... Asphalt Roofing Production Facility	
TCEQ PERMIT NUMBER: 7711A	
APPLICATION RECEIVED DATE: ..... December 19, 2008	
CUSTOMER REFERENCE NUMBER: CN602717464	
REGULATED ENTITY NUMBER: RN100788959	
Account Number: DB-0378-S	
COUNTY: ..... **Dallas**	**REGION:** **4**
LOCAL PROGRAM 1: Dallas	**LOCAL PROGRAM 2:**
PERMIT TYPE: Permit Amendment Application	
INTERNAL PROGRAM ROUTING	
AIR PERMITS TEAM LEADER: Mike Gould	**PHONE NO.** (512) 239-1097
TEAM LEADER: Donald D. Nelon	**DATE: 1/14/2009**
ADMINISTRATIVELY REVIEWED BY: Joanna Hunsberger	**PHONE NO.** (512) 239-1274
ADMINISTRATIVELY COMPLETE DATE: 1/14/2009	
***801 APPLIES**	

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2010-0896-AIR

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 20, 2010

MR DOUG HARRIS
ENGINEERING MANAGER
BUILDING MATERIAL CORPORATION OF AMERICAN
2006 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Number: 7711A
Building Materials Corporation of America
Asphalt Roofing Production Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN602717464
Account Number: DB-0378-S

Dear Mr. Hunter:

This letter is your notice that the executive director has issued final approval of the above-referenced application. According to Title 30 Texas Administrative Code § 50.135 (30 TAC § 50.135), the approval became effective on August 20, 2010, the date the executive director signed the permit. Enclosed is a copy of the executive director's response to comments.

You may file a **motion to overturn** with the Office of the Chief Clerk. A motion to overturn is a request for the Commission to review the executive director's decision. Any motion must explain why the Commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the chief clerk in person, or by mail to the chief clerk's address on the attached mailing list. On the same day the motion is transmitted to the chief clerk, please provide copies to the applicant, the executive director's attorney and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the Commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within

30 days after the effective date of the approval. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Individual members of the public may seek further information by calling the Texas Commission on Environmental Quality Office of Public Assistance, toll free at 1-800-687-4040.

Sincerely,

LaDonna Castañuela
Office of the Chief Clerk
Texas Commission on Environmental Quality

JG/kp

Enclosures

cc: Latha Kambham, Ph.D., Consultant, Trinity Consultants, Dallas
Ms. Christine M. Otto Chambers, Consultant, Trinity Consultants, Dallas
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 143272

DAVID HUNTER
2006 MCBROOM ST
DALLAS TX 75212-2450

TCEQ AIR QUALITY PERMIT NUMBER 7711A

APPLICATION BY	§	**BEFORE THE**
BUILDING MATERIALS	§	
CORPORATION OF AMERICA	§	
ASPHALT ROOFING PRODUCTION	§	**TEXAS COMMISSION ON**
FACILITY	§	
DALLAS, DALLAS COUNTY	§	
	§	**ENVIRONMENTAL QUALITY**

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk timely received comment letters from the following persons: David Hunter. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call the TCEQ Office of Public Assistance at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.state.tx.us.

BACKGROUND

Description of Facilities

Building Materials Corporation of America (the Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA), §382.0518. Air Quality Permit Number 7711A will authorize the modification of an existing facility that may emit air contaminants.

This permit will authorize the Applicant to modify existing operations to resolve deviations discovered as a result of stack testing. The Applicant will also be consolidating by incorporation, Standard Permit Registration No. 81652 as part of the amendment, and correcting permit representations for existing facilities and for facilities that no longer exist at the plant site. All permit changes will reflect current operating conditions for all permitted facilities at the site. There are no proposed production rate increases for asphalt shingles, physical modifications to existing facilities, or new construction of facilities. Building Materials Corporation of America has requested to increase asphalt throughput rates for Lines 1 and 3. However the increase in asphalt throughput will not result in an increase in the production (output) of asphalt shingles. The facilities are located at 2600 Singleton Blvd., Dallas, Dallas County. Contaminants authorized under this permit include particulate matter, including particulate matter less than 10

microns in diameter and particulate matter less than 2.5 microns in diameter ($PM/PM_{10}/PM_{2.5}$), sulfur dioxide (SO_2), volatile organic compounds (VOC), carbon monoxide (CO), and nitrogen oxides (NO_x).

Procedural Background

Before work is begun on the modification of an existing facility that may emit air contaminants, the person planning the modification must obtain a permit amendment from the commission. This permit application is amendment of Air Quality Permit Number 7711A.

The permit application was received on December 19, 2008, and declared administratively complete on January 14, 2009. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI or first public notice) for this permit application was published on February 5, 2009, in English in the *Dallas Observer* and in Spanish in *El Extra*. The Notice of Application and Preliminary Decision (NAPD or second public notice) for this permit application was published on March 11, 2010 in English in the *Dallas Observer*, and in Spanish in *El Extra*. Since this application was administratively complete after September 1, 1999, this action is subject to the procedural requirements adopted in accordance with House Bill 801, 76th Legislature, 1999.

COMMENTS AND RESPONSES

COMMENT 1: Commenter believes that air emissions from the plant may be causing, or have already caused, health-related illnesses that may be linked to cancer and other diseases. (David Hunter)

RESPONSE 1: Section 382.002 of the TCAA authorizes the commission to safeguard the state's air resources from pollution by controlling or abating air pollution and emissions of air contaminants, consistent with the protection of public health, general welfare and physical property including aesthetic enjoyment of air resources by the public and maintenance of adequate visibility. The commission does not regulate on-site worker health, but rather ambient (off-property) air. Criteria pollutants are those pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established. The U.S. EPA, under authority in the Federal Clean Air Act (FCAA), established NAAQS as levels of air quality to protect public health and welfare. The plant will continue to emit PM, including PM_{10} and $PM_{2.5}$, SO_2, VOCs, CO, and NO_X as the criteria pollutants. The NAAQS include both primary and secondary standards. The primary standards are those which the Administrator of the EPA determines are necessary, with an adequate margin of safety, to protect the public health, including sensitive members of the population such as children, the elderly, and individuals with existing lung or cardiovascular conditions. Secondary NAAQS standards are those which the Administrator determines are necessary to protect the public welfare and the environment, including animals, crops, vegetation, and buildings, from any known or anticipated adverse affects associated with the presence of an air contaminant in the ambient air. Every permit holder must comply with federal and state standards established for these pollutants to ensure the protectiveness of public health

and welfare. The TCAA requires that the Applicant demonstrate use of best available control technology (BACT) and that the emissions are not detrimental to public health and welfare.

In the review of this application, the proposed emission changes were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emission of PM, including PM_{10} and $PM_{2.5}$, SO_2, VOCs, CO, and NO_X. The Applicant will continue to use abatement devices and methods that meet, and in some cases exceed BACT criteria, for asphalt processing and asphalt roofing facilities with consideration given to economic reasonableness and technical practicality. All emissions are vented to an incinerator that will capture and destroy $PM/PM_{10}/PM_{2.5}$, VOC, and hazardous air pollutants with greater than ninety-five percent efficiency. A review of the RACT/BACT/ LAER Clearinghouse (RBLC), a database of nationwide permitted facilities was conducted to determine associated permitted emission limits and methods of abatement for similar sources. The review of the RBLC for asphalt processing and asphalt roofing plants resulted in one plant located in Ohio. The entry for the Ohio plant did show controls for abatement of PM/PM_{10}, CO, and VOC. However, the review resulted in no other existing similar stationary source employing abatement devices or methods for control of SO_2. Evaluation of the permitted limits for CO, VOC, and NO_X from the Ohio plant indicates the Applicant's proposed limits are lower than those listed in the RBLC for the Ohio plant for these pollutants. Although the Applicant's proposed limit of PM/PM_{10} is higher than the limits listed for the Ohio plant, the Applicant's proposed emission reduction plan for PM/PM_{10} meets or exceeds BACT of recently reviewed and approved permits for abatement of PM/PM_{10} from similar sources of emissions in the same industry type. Therefore, the Applicant's proposed emission limits represent BACT for all pollutants.

When necessary, the Toxicology Division reviews the non-criteria pollutants emitted from the proposed facility, comparing the facility's proposed emissions to Effects Screening Levels (ESLs). ESLs are constituent-specific guideline concentrations used in the Executive Director's effects evaluation of constituent concentrations in air. These guidelines are derived by TCEQ's Toxicology Division and are based on a constituent's potential to cause adverse health effects, odor nuisances, vegetation effects, or materials damage (e.g. corrosion). These health-based screening levels are set at levels lower than levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. Adverse health or welfare effects are not expected to occur if the air concentration of a constituent is below its ESL. If an air concentration of a constituent is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted. ESLs are established considering a generous safety factor to protect not only the general public, but also sensitive members of the general public. In the review of this application, the proposed health effects of asphalt vapors were evaluated, and it was determined that when the plant operates in compliance with its permit, it is not expected that existing health conditions will worsen or that there will be adverse health impacts from emissions of asphalt vapors.

Permit applications for new construction or modifications may be required to include an air quality analysis, which may include air dispersion modeling, to allow the TCEQ staff to evaluate the impact of emissions from the proposed facility upon the health, general welfare, and property of the public and for the Applicant to demonstrate compliance with all air quality rules and regulations and the intent of the TCAA. In this case, refined atmospheric dispersion modeling submitted in support of this application demonstrated that no cumulative concentration of any air contaminant will exceed any NAAQS established for criteria pollutants or any ESLs established for non-criteria pollutants. Appropriate background concentrations for criteria pollutants were retrieved from monitoring stations near the plant site to determine total concentrations for comparison against the NAAQS. Additional Toxicology review of the non-criteria pollutant (asphalt vapors, a class of VOCs) was unnecessary because the total concentration was less than the ESL.

Results of the air dispersion modeling conducted by the applicant indicate the project's modeled maximum ground level concentration (GLC_{max}) for 24-hour PM_{10} is 68$\mu g/m^3$, which is above the 24-hour PM_{10} *de minimis* concentration threshold of 5$\mu g/m^3$. In accordance with TCEQ Air Quality Modeling Guidelines, the next step requires the addition of the appropriate background concentration. In this case, 56$\mu g/m^3$ was added to the modeled concentration, resulting in a PM_{10} GLC_{max} concentration value of 124$\mu g/m^3$, which is below the NAAQS protectiveness limit of 150$\mu g/m^3$.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for annual PM_{10} emissions were predicted to be 18$\mu g/m^3$, which is above the PM_{10} *de minimis* concentration threshold of 1$\mu g/m^3$, and thus guidance requires the addition of the appropriate background concentration. In this case, the appropriate background concentration of 30$\mu g/m^3$ was added to the modeled annual GLC_{max}, resulting in a value of 48$\mu g/m^3$, which is lower than the NAAQS protectiveness limit of 50$\mu g/m^3$.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for 1-hour NO_2 to be 83$\mu g/m^3$, which is above the *de minimis* concentration threshold of 10$\mu g/m^3$, and thus guidance requires the addition of the appropriate background concentration. The appropriate background concentration of 103$\mu g/m^3$ was added, resulting in a maximum concentration of 186$\mu g/m^3$. This value is below the NAAQS protectiveness limit of 188$\mu g/m^3$.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for annual NO_2 to be 14$\mu g/m^3$, which is above the *de minimis* concentration threshold of 1$\mu g/m^3$. The appropriate background concentration of 30$\mu g/m^3$ was added to the modeled value at the GLC_{max} location, resulting in a maximum concentration of 44$\mu g/m^3$. This value is below the NAAQS protectiveness limit of 100$\mu g/m^3$.

To address the state property line standard for SO_2, the modeled 1-hour concentration was used as a surrogate for comparison against the 30-minute standard. Since there is no *de minimis* value, the GLC_{max} modeled value of 676$\mu g/m^3$ was compared directly against the TCEQ standard of 1,021$\mu g/m^3$ and found to be lower.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for 3-hour SO_2 was found to be 532µg/m^3 which is above the *de minimis* concentration threshold of 25µg/m^3. Therefore, the appropriate background concentration of 24µg/m^3 was added, resulting in a maximum concentration of 556µg/m^3. This value is below the NAAQS protectiveness limit of 1,300µg/m^3.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for 24-hour SO_2 to be 329µg/m^3, which is above the *de minimis* concentration threshold of 5µg/m^3. Therefore, the appropriate background concentration of 13µg/m^3 was added to the modeled value at the GLC_{max} location, resulting in a maximum concentration of 342µg/m^3. This value is below the NAAQS protectiveness limit of 365µg/m^3.

Results of the air dispersion modeling indicate the project's modeled GLC_{max} for annual SO_2 to be 39µg/m^3, which is above the *de minimis* concentration threshold of 1µg/m^3. Therefore, the appropriate background concentration of 3µg/m^3 was added to the modeled value at the GLC_{max} location, resulting in a maximum concentration of 42µg/m^3. This value is below the NAAQS protectiveness limit of 80µg/m^3.

Asphalt vapors from the facilities and operating procedure were evaluated on a short-term and a long-term basis for comparison to the ESL. On a 1-hour basis, the modeled value at the GLC_{max} location was found to be 336µg/m^3. This value is below the TCEQ Toxicology Division's ESL of 350µg/m^3 required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility. On an annual basis, the modeled value at the GLC_{max} location was found to be 25µg/m^3. This value is also below the TCEQ Toxicology Section's ESL of 35µg/m^3 required for protection of public health, general welfare, and physical property, including the aesthetic enjoyment of air resources by the public and the maintenance of adequate visibility.

All other contaminants were evaluated to be below the respective *de minimis* levels corresponding to the contaminant and the time averaging period required by the NAAQS to determine protectiveness.

In addition to meeting the above federal and state standards and guidelines, applicants must comply with 30 TAC § 101.4, which prohibits nuisance conditions. Specifically, that rule states that "no person shall discharge from any source" air contaminants which are or may "tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or as to interfere with the normal use and enjoyment of animal life, vegetation, or property." As long as the facilities at the plant are operated in compliance with the terms of the permit, nuisance conditions or conditions of air pollution are not expected.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free

Environmental Complaints Hotline at 1-888-777-3186. If the plant is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action. Citizen-collected evidence may be used in such an action. See 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. The TCEQ has procedures in place for accepting environmental complaints from the general public but now has a new tool for bringing potential environmental problems to light. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law and the information can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028, and may be downloaded from the agency website at www.tceq.state.tx.us (under Publications, search for document no. 278).

CHANGES MADE IN RESPONSE TO COMMENT

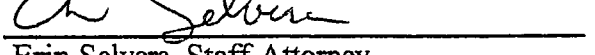
No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director
Environmental Law Division



Erin Selvera, Staff Attorney
Environmental Law Division
State Bar Number 24043385
PO Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239-6033

REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

MAILING LIST FOR PERMIT NUMBER: 7711A
Dallas County

FOR THE APPLICANT:

Mr. David Fuellerman
Plant Manager
Building Materials Corporation of America
2600 Singleton Boulevard
Dallas, Texas 75212-3738

PROTESTANTS/INTERESTED PERSONS:

See Attached List

FOR THE EXECUTIVE DIRECTOR:

Ms. Erin Selvera
Texas Commission on Environmental Quality
Environmental Law Division, MC-173
P.O. Box 13087
Austin, Texas 78711-3087

Mr. Javier Galván, P.E.
Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
P.O. Box 13087
Austin, Texas 78711-3087

FOR OFFICE OF PUBLIC ASSISTANCE:

Ms. Bridget Bohac
Texas Commission on Environmental Quality
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Austin, Texas 78711-3087

FOR PUBLIC INTEREST COUNSEL:

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FOR THE CHIEF CLERK:

Ms. LaDonna Castañuela
Texas Commission on Environmental Quality
Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711-3087

DB03785

Javier Galvan - GAF (BMCA) Acceptance of draft permit GAF - Permit No. 7711A

From: "Rod Johnson" <RJohnson@brownmccarroll.com>
To: <jGalvan@tceq.state.tx.us>
Date: 8/19/2010 4:21 PM
Subject: GAF (BMCA) Acceptance of draft permit GAF - Permit No. 7711A
CC: "Bright, Fred" <FBright@gaf.com>, "Chambers, Christine" <CChambers@trinityconsultants.com>, "Harris, Doug" <dharris@gaf.com>, "Kambham, Latha" <LKambham@trinityconsultants.com>, <mgould@tceq.state.tx.us>, <showell@tceq.state.tx.us>
Attachments: 0812-2009 Email_HAP Emissions_1.pdf; CND - Building Materials Corporation of America (7711A) (amend)_1.doc; HAP Emissions Summary (081109)_1.pdf

Dear Mr. Galvan,

In order to expedite and finalize the issuance of the amendment to Permit No. 7711A, BMCA / GAF accepts the revised draft sent earlier today.

We understand APD has a question as to the source of the HAP emissions projections. As provided to TCEQ previously (see Attached), the calculations were based on (1) proposed through put rates in the amended permit and (2) data collected by EPA in preparation to establish MACT and Area Source standards under Part 63. The GAF plant is an area source and subject to 40 CFR Part 63, Subpart AAAAAAA. Under Subpart "7A", testing for HAPs will be required and submitted to TCEQ.

As to increases in HAP emissions associated with proposed throughput changes, there is no change in annual throughput, only short term throughput to correct an error in the permit. Therefore the annual limit does not change.

This permit amendment is part of an Agreed Order requirement for which BMCA has had to ask for multiple extensions. On behalf of BMCA, I respectfully request that the final permit be issued no later than Friday, August 20, 2010.

We are available to speak with you and TCEQ management tomorrow morning to iron out any last issues. If you have any questions, please do not hesitate to contact any one of us copied on this email.

Thank you for your prompt assistance.

Best Regards,

Rod

BROWN : Attorneys : at Law MCCARROLL

Rod Johnson
Partner
Brown McCarroll, L.L.P.

111 Congress Avenue, Suite 1400, Austin, TX 78701
office: 512-479-11125 | mobile: 512-636-6601 | fax: 512-479-1101

www.brownmccarroll.com | rjohnson@brownmccarroll.com | bio

From: Christine Chambers <CChambers@trinityconsultants.com>
To: "Javier Galvan" <JGalvan@tceq.state.tx.us>
CC: "Doug Harris" <dharris@gaf.com>, Latha Kambham <LKambham@trinityconsulta...
Date: 8/12/2009 9:38 AM
Subject: Building Materials - NSR No. 7711A: Follow-Up Items
Attachments: CND - Building Materials Corporation of America (7711A) (amend).doc; HAP Emissions Summary (081109).pdf

Javier,

Per our July 17, 2009 call related to the GAF Materials Draft NSR Permit No. 7711A (see attached), please find below the last follow-up items. If you would like to discuss these further, please let us know.

Don't see any corrections / mark-ups ?? GA 9.1.09

Thank you,
Christine

NESHAP LLLLL Determination: GAF Dallas Plant is not a major source of HAPs Please find attached site-wide HAP emissions calculations for the GAF Dallas Plant demonstrating the site is a minor source of HAPs. Emission from Natural Gas Combustion are calculated based on potential annual natural gas usage and emission factors obtained from AP-42 Section 1.4. Natural Gas Combustion. Emissions from all other asphalt related operations are calculated based on the potential annual asphalt throughput rates and emission factors obtained from the Asphalt Roofing Manufacturer's Association (ARMA) and EPA stack sampling program for MACT Standards (summary of sampling results). Since these emission factors are not published, and we can not confirm their absolute accuracy, GAF believes they are significantly accurate to demonstrate the site is a minor source for HAP and GAF therefore submits these values solely for that purpose and to demonstrate the site's emission limitations are not subject to Sec. 112 MACT requirements.

Special Condition 7.B. Proposed Special Condition wording based on outlet concentration.

The control efficiency of the thermal oxidizer is not used as the basis for the proposed emission rates and as such, GAF is requesting that the wording for Special Condition 7.B. track the language of TCEQ's 30 TAC Chapter 115.122 requirements by using an outlet concentration. "The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of at least 90% or to a VOC concentration of no more than 20 parts per million by volume (ppmv) (on a dry basis corrected to 3.0% oxygen)."
Current Draft Special Condition Verbiage:
7.B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of 98 percent. (8/09)

Proposed Draft Special Condition Verbiage:
7.B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a VOC concentration of no more than 20 parts per million by volume (ppmv) (on a dry basis corrected to 3.0% oxygen)." (8/09)

****
Christine M. Otto Chambers
Managing Consultant
Trinity Consultants
(972) 661-8100 Phone

SPECIAL CONDITIONS

Permit Number 7711A

EMISSION STANDARDS AND FUEL SPECIFICATIONS

1. Total emissions from these sources shall not exceed the values stated on the enclosed table entitled "Emission Sources - Maximum Allowable Emission Rates." The permitted emission limits for all emission point numbers (EPNs), with the exception of the Standby Boiler (EPN BLR 5), are based on 8,760 annual hours of operation. The permitted emission limits for EPN BLR 5 are based on 480 annual hours of operation. **(8/09)**

2. Fuel for the facilities shall be pipeline sweet natural gas as defined in Title 30 Texas Administrative Code Chapter 101 (30 TAC Chapter 101). Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

3. The holder of this permit shall comply with all requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources (NSPS), promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR 60), for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. **(8/09)**

OPACITY/VISIBLE EMISSION LIMITATIONS

4. Opacity of emissions from the coalescing filter mist systems (EPN CFL/34), the electrostatic precipitator (EPN CFL/34) when used as a back-up control device for the filter mist systems, all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period as determined by EPA Test Method (TM) 9 or equivalent. **(8/09)**

5. Opacity of emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed zero percent averaged over a six-minute period as determined by EPA TM 9 or equivalent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of emissions from any blowing still shall not exceed zero percent averaged over a six-minute period as determined by EPA TM 9 or equivalent. Opacity of emissions from any storage silo and mineral handling facility shall not exceed one percent averaged over a six-minute period as determined by EPA TM 9 or equivalent. **(8/09)**

6. No visible emissions from this asphalt processing and asphalt roofing manufacturing operation, road, or travel area shall leave the property. Visible emissions

shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using EPA TM 22 or equivalent. **(8/09)**

OPERATIONAL LIMITATIONS AND WORK PRACTICES

7. The company has represented the following to comply with all TCEQ rules and regulations:

   A. All filler and backing material shall be received and transferred with no visible emissions from these materials leaving the building. **(8/09)**

   B. The emissions from Stillyard Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120 containing asphalt, from Blowing Stills T-13 and T-26, from truck and railcar loading and unloading operations, and from the self-seal asphalt storage tank shall be vented to the thermal oxidizer. The thermal oxidizer shall be operated and maintained to achieve a minimum VOC control efficiency of 98 percent. **(8/09)**

   C. The maximum allowable asphalt throughput rates are 32,063 pounds per hour (lbs/hr) for Line 1 and 53,438 lbs/hr for Line 3. **(8/09)**

   D. The maximum allowable production rate for both Line 1 and Line 3 is 171 tons per hour and 1,498,000 tons per year of finished shingles. **(8/09)**

8. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.

9. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible particulate matter (PM) emissions to maintain compliance with all TCEQ rules and regulations.

10. There shall be no changes in representations unless the permit is altered or amended. **(8/09)**

INITIAL DETERMINATION OF COMPLIANCE

11. Within 180 days after the issuance date of this permit, stack sampling of the Electrostatic Precipitator (EPN 34) and the Boiler/Thermal Oxidizer Vent (EPN 8) for PM, nitrogen oxides (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), and volatile organic compounds (VOC) emissions shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Also within 180 days after the issuance of this permit, stack sampling

of the emissions from Line 1 cooling section (EPN COOL1) and Line 3 cooling section (COOL3) shall occur to demonstrate compliance with the allowable emissions set forth in this permit. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with any applicable requirements of 40 CFR Part 60 requires EPA approval, and requests shall be submitted to the TCEQ Austin Compliance Support Division.

CONTINUOUS DETERMINATION OF COMPLIANCE

12. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the opacity limits specified in Special Condition Nos. 4 and 5, the holder of this permit shall conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowables specified in the maximum allowable emission rates table. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual or in accordance with applicable EPA Code of Federal Regulations procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(8/09)**

Possible additional testing for the thermal oxidizer

SAMPLING REQUIREMENTS

13. Sampling ports and platform(s) shall be installed on the exhaust stack according to the specifications set forth in the TCEQ Sampling Procedures Manual, "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.

14. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their expense.

15. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for initial and/or continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during initial compliance testing, then the production/throughput rates or other parameter may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates.

16. A pretest meeting concerning the required sampling and/or monitoring shall be held with personnel from TCEQ before the required tests are performed. Air contaminants to be tested for and test methods to be used shall be confirmed at this pretest meeting.

    A. During a continuous compliance determination with Special Condition No. 11 stipulations, sampling shall occur within 60 days of the written notification of violation from the TCEQ.

    B. The TCEQ Regional Office shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

        (1) Date for pretest meeting.
        (2) Date sampling will occur.
        (3) Name of firm conducting sampling.
        (4) Type of sampling equipment to be used.
        (5) Method or procedure to be used in sampling.

        The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

    C. Air contaminants to be tested for include (but are not limited to) PM, CO, SO_2, NO_x, and VOC.

    D. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

        One copy to the TCEQ Dallas/Fort Worth Regional Office;
        One copy to the TCEQ Austin Compliance Support Division.

17. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.

18. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division.

RECORDKEEPING REQUIREMENTS

19. In addition to the recordkeeping requirements specified in General Condition No. 7 and 40 CFR 60, Subparts A, Dc, and UU, the following records shall be kept and maintained on-site for a rolling twenty-four month period: **(8/09)**

    A. Records for exempted process vents; and

    B. Records of repairs and maintenance of all pollution abatement equipment.

DB0378S/7711A

GAF MATERIALS CORPORATION

Dallas Plant
Dallas County, Texas

State Air Quality Dispersion Modeling Analysis

TCEQ Account No. DB-0378-S
TCEQ Customer Number (CN) 602717464
TCEQ Regulated Entity Number (RN) 100788959

May 2009
Project 084401.0087

Trinity Consultants
trinityconsultants.com

Trinity Consultants

Offices nationwide ▪ trinityconsultants.com

12770 Merit Drive, Suite 900, Dallas, TX 75251 U.S.A. ▪ (972) 661-8100 ▪ Fax (972) 385-9203

May 5, 2009

Mr. Javier V. Galvan
Texas Commission on Environmental Quality
12100 Park 35 Circle, Mail Code 163
Building C, Third Floor
Austin, TX 78753

RE: Modeling Report for the Permit Amendment Application
Building Materials Corporation of America - Dallas Plant - Dallas County
Permit No. 7711A
TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959

Mr. Galvan,

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

Please find enclosed a modeling report in support of the New Source Review (NSR) Permit Amendment Application (submitted December 2008) for the GAF Dallas Plant. As demonstrated in the enclosed modeling report, the predicted impacts from the proposed project will not cause or contribute to a violation of any applicable National Ambient Air Quality Standards (NAAQS) or State Property Line Standard, or cause or contribute to adverse impacts on human health or the environment.

If you have any questions regarding this application, please feel free to me at (972) 661-8100 or Mr. Doug Harris of GAF at (214) 637-8909.

Sincerely,

TRINITY CONSULTANTS

Christine Chambers

Christine Chambers
Managing Consultant

cc: Mr. Fred Bright, GAF
Mr. Doug Harris, GAF

STATE AIR QUALITY DISPERSION MODELING ANALYSIS
GAF MATERIALS CORPORATION ▪ DALLAS PLANT

TCEQ ACCOUNT NO. DB-0378-S

TCEQ CUSTOMER NUMBER (CN) 602717464

TCEQ REGULATED ENTITY NUMBER (RN) 100788959

DALLAS COUNTY, TEXAS

Prepared by:

GAF MATERIALS CORPORATION
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May 2009

Project 084401.0087

GAF®
GAF MATERIALS CORPORATION

Trinity Consultants

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1. EXECUTIVE SUMMARY

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). GAF operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 602717464. The Dallas Plant has been assigned TCEQ Air Quality Account Number DB-0378-S and Regulated Entity Number (RN) 100788959.

GAF has submitted a minor New Source Review (NSR) air quality permit amendment application to TCEQ (dated December 2008) for the Dallas Plant to amend TCEQ Permit No. 7711A.[1] In support of the TCEQ air quality permit amendment application, GAF is submitting this state air quality dispersion modeling analysis to demonstrate that emissions of criteria pollutants for which the application proposes increases [i.e., carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter less than or equal to ten microns (PM_{10})[2]], and non-criteria pollutants (i.e., asphalt vapor) from the Dallas Plant will not cause or contribute to a violation of any applicable National Ambient Air Quality Standards (NAAQS) or State Property Line Standard, or cause or contribute to adverse impacts on human health or the environment. In addition, as a part of the December 2008 permit amendment application, GAF updated source stack parameters presented on Table 1(a) of the May 2004 Air Dispersion Modeling submittal. A copy of Table 1(a) included in the December 2008 permit amendment application is provided in Appendix A of this report. The updated stack parameters are included in the air dispersion modeling analysis presented in this report.

The State NAAQS air quality dispersion modeling analysis is conducted to evaluate the criteria pollutant emissions from the Dallas Plant. The asphalt vapor emissions from the Dallas Plant are evaluated per TCEQ guidance for the purpose of a health effects review.[3] Additionally, a State Property Line Analysis is performed for SO_2.

A table summarizing the modeled source parameters is provided in Table B-1 in Appendix B of this modeling report. Tables summarizing the proposed short-term and long-term emissions of all criteria pollutants included in the State NAAQS analysis and State Property Line analysis are provided in Table B-2. A table summarizing the proposed short-term and long-term emissions for asphalt vapor included in the State Health Effects evaluation is provided in Table B-3 in Appendix B.

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[1] TCEQ Air Quality Permit Amendment Application, GAF Materials Corporation, Dallas Plant, December 18, 2008.

[2] $PM_{2.5}$ implementation rules for NSR review have not been finalized; therefore, per EPA guidance (April 5, 2005, Mr. Stephen Page, "Implementation of New Source Review Requirements in $PM_{2.5}$ Nonattainment Areas" and October 23, 1997, Mr. John Seitz, "Interim Implementation of New Source Review Requirements for $PM_{2.5}$"), and TCEQ guidance (e-mail from Mr. Eddie Mack (TCEQ) to Mr. Vineet Masuraha (Trinity), March 5, 2007) PM_{10}, including the revoked annual standard, is used as a surrogate for $PM_{2.5}$.

[3] TCEQ, Air Permit Reviewer Reference Guide, Modeling and Effects Review Applicability: How to Determine the Scope of Modeling and Effects Review for Air Permits, APDG 5874, August 2008.

This report summarizes the methodology used and results obtained for the state air quality dispersion modeling analyses conducted in support of the TCEQ air quality permit amendment application. The associated electronic files and description of the files are provided in Section 8 of this modeling report.

1.1 SUMMARY OF MODELING AND RESULTS

This report contains the following information as described by TCEQ guidance:[4]

- Aerial photograph showing the property line, surrounding land use type and near-by sensitive (non-industrial) locations,
- Plot plans showing the modeled emission sources, modeled downwash structures, and property line used in the air dispersion modeling analyses,
- A list of modeled emission sources and their corresponding parameters included in the air dispersion modeling analyses,
- A detailed description of the methodology used in conducting the air dispersion modeling analyses, and
- An evaluation of the dispersion modeling results for the State NAAQS, State Health Effects review, and State Property Line analysis.

The air dispersion modeling analyses presented in this report is conducted using the United States Environmental Protection Agency's (U.S. EPA's) AERMOD model (version 07026). All modeling procedures used in this analysis are consistent with current United States Environmental Protection Agency (U. S. EPA) and TCEQ Air Quality Modeling guidelines.[5, 6]

The air dispersion modeling analyses estimate the maximum ground-level concentrations due to criteria pollutants and asphalt vapor emissions from the Dallas Plant. As summarized in Section 7 of this report, the air dispersion modeling analyses demonstrate compliance with applicable State NAAQS, State Health Effects guidelines, and State Property Line standards.

[4] TCEQ Air Dispersion Modeling Guidelines, RG-25 (Revised), February 1999.
[5] Code of Federal Regulations, Title 40-Protection of the Environment, Part 51, Appendix W, accessed at www.bna.com.
[6] TCEQ Air Dispersion Modeling Guidelines, RG-25 (Revised), February 1999.

2. GENERAL AIR QUALITY DISPERSION MODELING APPROACH

This section discusses the air quality dispersion modeling methodologies used to demonstrate compliance with the applicable State NAAQS Analysis, State Health Effect evaluation, and State Property Line standards.

2.1 STATE NAAQS ANALYSIS

The State NAAQS air quality dispersion modeling analysis conducted in support of the permit amendment application is organized into two major sections for each applicable criteria pollutant: the Significance Analysis and the Full Impact Analysis. The techniques used in the air quality dispersion modeling analysis are consistent with current TCEQ and U.S. EPA modeling procedures.[7, 8]

2.1.1 SIGNIFICANCE ANALYSIS

In the Significance Analysis, the emissions of CO, NO_2, SO_2, and PM_{10} from the Dallas Plant were evaluated to determine whether they have the potential for a significant impact upon the area surrounding the Plant. Per TCEQ modeling guidance, all modeled impacts are reported as the highest first high (H1H) modeled concentration.[9] The Significance Analysis determines if a complete Full Impact Analysis is required.

Per U.S. EPA guidance, the Significance Analysis considers the emissions associated *only* with the proposed project to determine whether it will have a significant impact upon the surrounding area. As mentioned in Section 1 of this modeling report, as a part of the December 2008 Permit Amendment Application GAF updated source stack parameters from the May 2004 Air Dispersion Modeling submittal. Therefore, the significance analysis is performed using the site-wide proposed emissions from the Dallas Plant.

As a first step, the modeled maximum ground level concentrations (GLC_{max}) from the significance analysis are compared to the corresponding modeling significance levels (MSLs) to determine whether any modeled ground-level concentrations at any receptor locations are greater than or equal to the MSL (i.e., "significant" receptors).

The significance analysis for CO and NO_2 is performed using a screening modeling approach and the significance analysis for PM_{10} and SO_2 is performed using a refined modeling approach. Both approaches are discussed in the following subsections.

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[7] Code of Federal Regulations, Title 40–Protection of Environment, Part 51, Appendix W, accessed at www.bna.com.

[8] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999.

[9] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999.

2.1.1.1 SCREENING MODELING (FOR CO AND NO_2)

The GLC_{max} results for CO and NO_2 are obtained using a conservative screening analysis approach, referred to as the ratio technique, as described below[10]:

1. Each emission source (EPN) is modeled with a unit emission rate of one pound per hour (lb/hr).
2. The maximum ground level concentration in micrograms per cubic meter ($\mu g/m^3$) per unit emission rate in lb/hr ("normalized impact") is obtained for each EPN for the 1-hour, 3-hour, 8-hour, 24-hour, and annual averaging periods using AERMOD. The AERMOD modeled normalized impacts for each averaging period and each EPN that is evaluated for State NAAQS Analysis are shown in Table C-1 of Appendix C.
3. The normalized impact for each averaging period obtained in step 2 for each EPN emitting CO and NO_2 is multiplied by the EPN's corresponding proposed short-term (hourly) CO and NO_2 emission rate (lb/hr) to obtain the maximum ground level concentration (GLC_{max}) for each applicable averaging period for each EPN.

The total GLC_{max} for each pollutant and averaging period obtained using the screening evaluation is the sum of maximum individual impacts from each EPN (i.e., independent of time and space). Table C-2 in Appendix C shows the proposed hourly emissions and the calculation of the total GLC_{max} using the ratio modeling technique for CO (1-hour and 8-hour) and NO_2 (annual). Each pollutant's GLC_{max} obtained using the screening analysis is very conservative and higher than the expected actual impacts for the following reasons:

- The individual GLC_{max} from each EPN are summed regardless of the location of the maximum impact and time or day that the maximum impact from each EPN is predicted to occur. This is a conservative procedure because it is very unlikely that the GLC_{max} from every EPN will occur at the same location and at the same time.
- For modeling demonstration purposes, CO and NO_2 emissions from the thermal oxidizer are assumed to be emitted from only the worst-case process stack between 8 and 8A for all 8,760 hours in a year. Since this is unlikely to be the case, the annual averaging period impacts evaluated for the Dallas Plant are more conservative than the expected actual impacts. The conservative modeling approach also gives GAF the flexibility to direct thermal oxidizer emissions to both of the two EPNs, since the worst-case situation is modeled.
- The maximum hourly emission rate (lb/hr) is modeled for each source for all 8,760 hours. For sources which do not operate 8,760 hours a year [(e.g., Standby Boiler Vent (EPN BLR5)], this provides a conservative estimate of annual impacts.

If the GLC_{max} for each pollutant modeled in the screening approach is less than the corresponding MSLs, the demonstration is complete.

[10] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Section 3.3.1.

If the Significance Analysis reveals that modeled maximum ground-level concentration for a particular pollutant and averaging period is greater than or equal to the applicable MSL, a background concentration, as obtained from the TCEQ's screening background concentrations or from ambient air monitors, is added to the GLC_{max} result and compared to 90 percent of the State NAAQS, per TCEQ guidance.[11] No further analysis is required for the pollutant and averaging period if the resultant concentration is less than 90 percent of the NAAQS.

2.1.1.2 REFINED MODELING (FOR SO_2 AND PM_{10})

Site-wide refined air dispersion modeling is performed to predict the GLC_{max} for the SO_2 (3-hour, 24-hour, and annual) and PM_{10} (24-hour and annual) Significance Analysis using the proposed hourly emissions from each emission source. For each refined analysis, all EPNs at the site that emit either SO_2 or PM_{10} are modeled concurrently to determine the respective GLC_{max}.

If the GLC_{max} for each pollutant is less than the corresponding MSLs, the demonstration is complete. If the Significance Analysis reveals that a modeled ground-level concentration for a particular pollutant and averaging period is greater than or equal to the applicable MSL, background concentrations from ambient air monitors are added to the GLC_{max} results and compared to 90 percent of the State NAAQS, per TCEQ guidance.[12] No further analysis is required if the resultant concentrations are less than 90 percent of the NAAQS. The results for refined modeling analysis are shown in Table C-3 of Appendix C.

2.1.2 FULL IMPACT ANALYSIS

A Full Impact Analysis is conducted for pollutants and averaging periods found to have a significant impact and where the resultant concentrations from the Significance Analysis plus the background concentrations are greater than 90 percent of the NAAQS. For each pollutant subject to a Full Impact Analysis, the Radius of Impact (ROI) is determined. The ROI is the farthest distance from the center of the modeled sources to the receptor where modeled ground-level concentrations are greater than or equal to the applicable MSL for each applicable averaging period.[13] The largest radius for each pollutant, regardless of the averaging period, is used in the air quality dispersion modeling analysis to establish the pollutant-specific ROI.

Based on this ROI, an inventory retrieval is requested from the TCEQ, using the *secondary* radius search option. The inventory identifies sources beyond the facility property line that could affect pollutant concentrations within the Area of Impact (AOI). All receptors within the AOI for each pollutant and averaging period are included in the Full Impact Analysis. The additional inventory sources are added into the model and the total impacts are modeled. The background concentration of the modeled pollutant, as obtained from the TCEQ screening background concentrations or from ambient air monitors, is added to the total modeled

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[11] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Section 3.6.
[12] Ibid.
[13] Ibid.

maximum concentration and compared to the NAAQS. If the resulting concentrations are below the NAAQS, the demonstration is complete.

Based on the results of the Significance Analysis, a Full Impact Analysis is performed for SO_2 (24-hour) and PM_{10} (annual). The results for full impact analysis are shown in Table C-4 of Appendix C.

2.1.3 AIR QUALITY MONITORING DATA

The impacts of emissions from the on-property sources are modeled in the air quality dispersion modeling analyses to demonstrate compliance for the State NAAQS analysis. Modeled ambient air concentrations only reflect the impacts from industrial emission sources. Therefore, to truly assess compliance with the NAAQS, "background" concentrations are typically added to the modeled ground-level concentrations. These background concentrations are representative of emissions from natural sources, nearby emission sources other than the emission sources under consideration, and unidentified emission sources.

TCEQ modeling analysis procedures allow for the use of screening background concentrations in State NAAQS analyses.[14] Background concentrations can be determined based on TCEQ screening background concentration or on recent air monitoring data.[15]

In this analysis, monitoring data in lieu of screening background concentrations are applied to the NO_2 (annual), PM_{10} (24-hour and annual) and SO_2 (3-hour, 24-hour, and annual) State NAAQS analyses.

The most recent three years (2006 - 2008) of monitoring data for NO_2, SO_2, and PM_{10} from EPA's AIRData are obtained for monitoring stations located in Dallas County, where the GAF Dallas Plant is located. The 2006 monitoring data set is used since it meets TCEQ's completeness criteria and provides background concentration that are the highest or equal to the highest values among the recent three year period, 2006-2008.[16] Per TCEQ guidance, the years with incomplete data (2007 and 2008) were also considered but were found not to have a higher concentration than the next complete year.[17] Since there are multiple NO_2 and PM_{10} monitors in Dallas County, the monitors with the highest NO_2 and PM_{10} concentration are used. The monitored concentrations are conservative with respect to the location of the Dallas Plant because the monitored values reflect contributions from large industrial sources and background sources.

Per TCEQ guidance, the high second highest (H2H) concentration monitored for short-term averaging periods (24-hour or less) and the annual average concentration for long-term

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[14] Ibid.

[15] TCEQ interoffice memorandum, *Background Concentration Determination for Use in NAAQS Analyses*, September 2, 1998.

[16] EPA's AIR data: http://www.epa.gov/air/data/.

[17] TCEQ interoffice memorandum, *Background Concentration Determination for Use in NAAQS Analyses*, September 2, 1998.

averaging periods (more than 24-hour) are used for the monitored background concentration.[18] The use of H2H for short-term is appropriate to use since:

- It follows the one exceedance form of the short-term NAAQS, and
- Background concentrations are added to the modeled concentrations without regard to time and space.

Table 2-1 shows the background concentrations for NO_2, SO_2, and PM_{10} used in State NAAQS analyses for the Dallas Plant.

TABLE 2-1. BACKGROUND CONCENTRATIONS USED FOR THE GAF DALLAS PLANT NAAQS ANALYSIS

Pollutant [A]	Averaging Period	Background Concentration ($\mu g/m^3$)
PM_{10}	24-hour	56
	Annual	30
SO_2	3-hour	24
	24-hour	13
	Annual	3
NO_2	Annual	30

[A] NO_2, PM_{10}, and SO_2 background concentrations obtained from 2006 monitoring data. PM_{10} concentrations are obtained from the monitor at 3004 N. Westmoreland, (site ID: 481130057), and NO_2 and SO_2 concentrations are obtained from the monitor at 1415 Hinton Street (site ID: 481130069), Dallas County. Monitored values for NO_2 and SO_2 were obtained in units of ppm and were converted to $\mu g/m^3$.

The results of the State NAAQS analysis are presented in Section 7.1 of this report.

2.2 STATE HEALTH EFFECTS EVALUATION

A site-wide refined air dispersion modeling analysis is conducted for emissions of asphalt vapor (using hourly emission rates) from each source at the GAF Dallas Plant and evaluated per the August 2008 guidance from the TCEQ Toxicology and Risk Assessment (TARA) section.[19] The Effects Screening Levels (ESLs) for asphalt vapor are obtained from the TCEQ's September 15, 2008, ESL list for the State Health Effects evaluation and are shown in Table 2-2.[20]

The hourly and annual GLC_{max} for asphalt vapor obtained through the refined air dispersion modeling analysis are compared with the corresponding ESLs. If the GLC_{max} are less than the corresponding ESLs, no further evaluation is required. If the predicted GLC_{max} for asphalt vapor are greater than the corresponding ESLs, a Tier II or Tier III analysis is performed in support of the State Health Effect evaluation.

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[18] TCEQ interoffice memorandum, *Background Concentration Determination for Use in NAAQS Analyses*, September 2, 1998.

[19] TCEQ, Air Permit Reviewer Reference Guide, Modeling and Effects Review Applicability: How to Determine the Scope of Modeling and Effects Review for Air Permits, APDG 5874, August 2008.

[20] http://www.tceq.state.tx.us/implementation/tox/esl/list_main.html#esl_1

The results of the State Health Effects analysis are presented in Section 7.2 of this report.

TABLE 2-2. EFFECTS SCREENING LEVEL (ESL) FOR ASPHALT VAPOR

Pollutant	Averaging Period	ESL ($\mu g/m^3$)
Asphalt Vapor	1-hour	350
	Annual	35

2.3 STATE PROPERTY LINE ANALYSIS

An air quality dispersion modeling analysis for SO_2 (1-hour) is performed to demonstrate compliance with State Property Line standards of SO_2.

The State NAAQS modeling procedures are generally applicable to the State Property Line modeling analysis, except that off-property inventory sources and ambient background concentrations are not considered in the State Property Line modeling analysis, because the standard is expressed as the net contribution from the on-property sources. The State Property Line modeling analysis includes all of the on-property sources at the Dallas Plant that emit SO_2. The GLC_{max} results for SO_2 (1-hour) are obtained using the refined modeling approach as described in Section 2.1.1.2.

The TCEQ State Property Line analysis standard for SO_2 is shown in Table 2-3 below. The State Property Line analysis compares the maximum (H1H) modeled concentration at any off-property receptor to the applicable state property line standard. The results of State Property Line analysis are presented in Section 7.3 of this report. Per TCEQ guidance, the maximum modeled ground-level SO_2 concentration for the 1-hour averaging period is used for comparison with the 30-minute standard.[21]

TABLE 2-3. STATE PROPERTY LINE STANDARDS

Pollutant	Averaging Period	Standard ($\mu g/m^3$)
SO_2	30-min [1]	1,021

[1] Per TCEQ guidance, Modeled H1H concentration for 1-hour is used to compare to the 30-minuate averaging SO_2 standard.

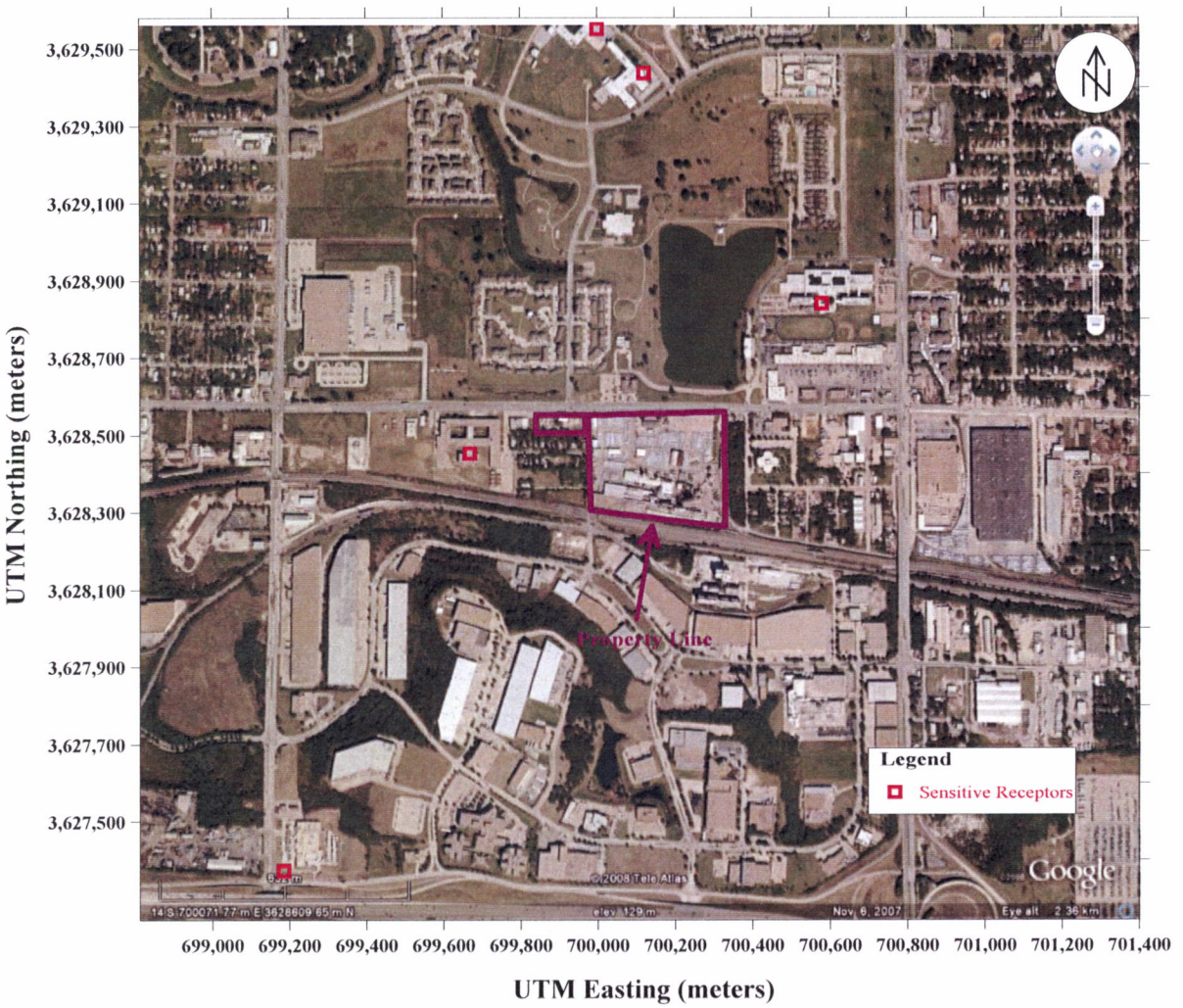
[21] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Section 3.5.

3. AERIAL PHOTOGRAPH

An aerial photograph of the Dallas Plant is provided in Figure 3-1, and shows the surrounding land use within 3,000 feet from each side of the Dallas Plant property line along with the location of sensitive receptors. As shown in Figure 3-1, the area within 3,000 feet of the Dallas Plant consists primarily of urban, industrial, and residential regions.

Please note the referenced Universal Transverse Mercator (UTM) coordinates are in North American Datum 27 (NAD 27). The Dallas Plant is located in UTM Zone 14.

FIGURE 3-1. AERIAL PHOTOGRAPH OF THE GAF DALLAS PLANT



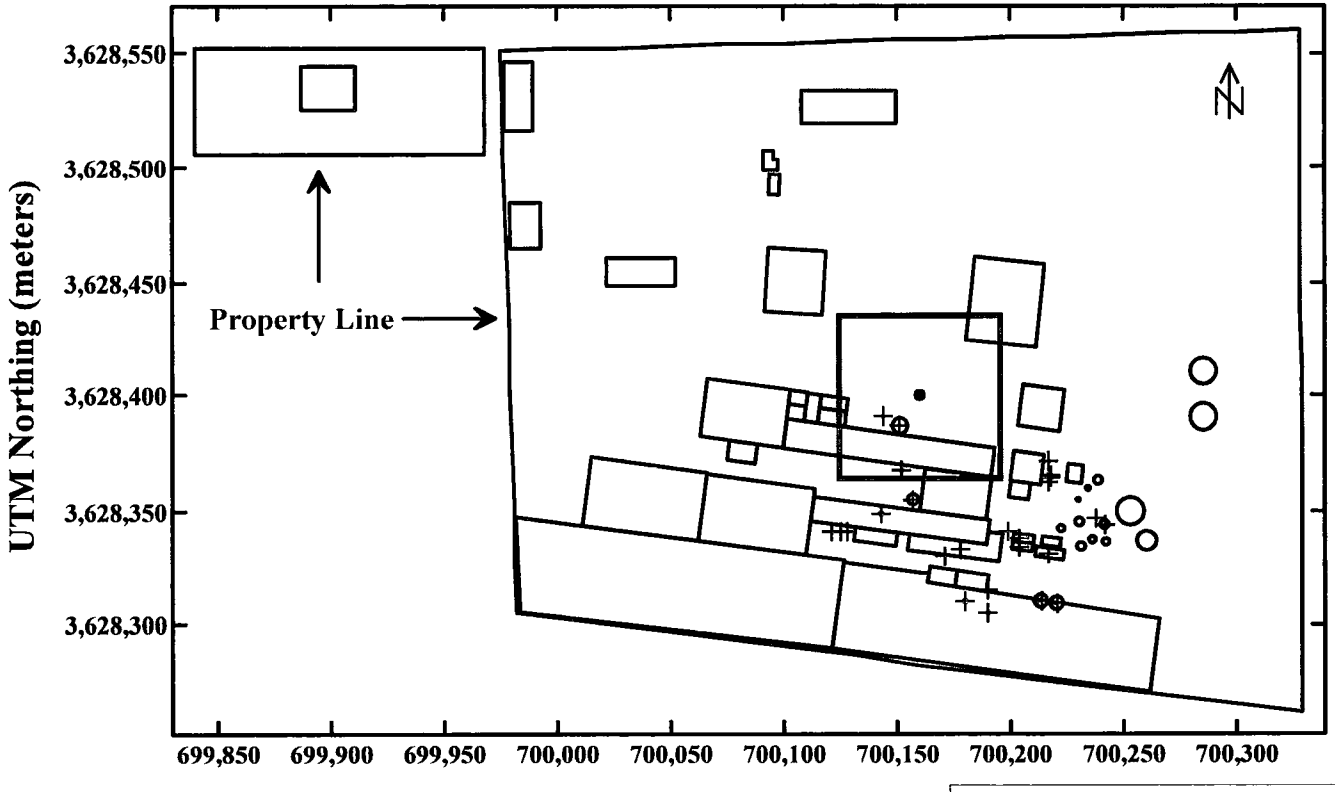
Referenced UTM Coordinates are in NAD 27 Datum.

Map Image from Google Earth Mapping Service [Version 4.3.7284.3916 (beta)], Nov. 6, 2007. Accessed on Nov. 12, 2008.

4. PLOT PLAN

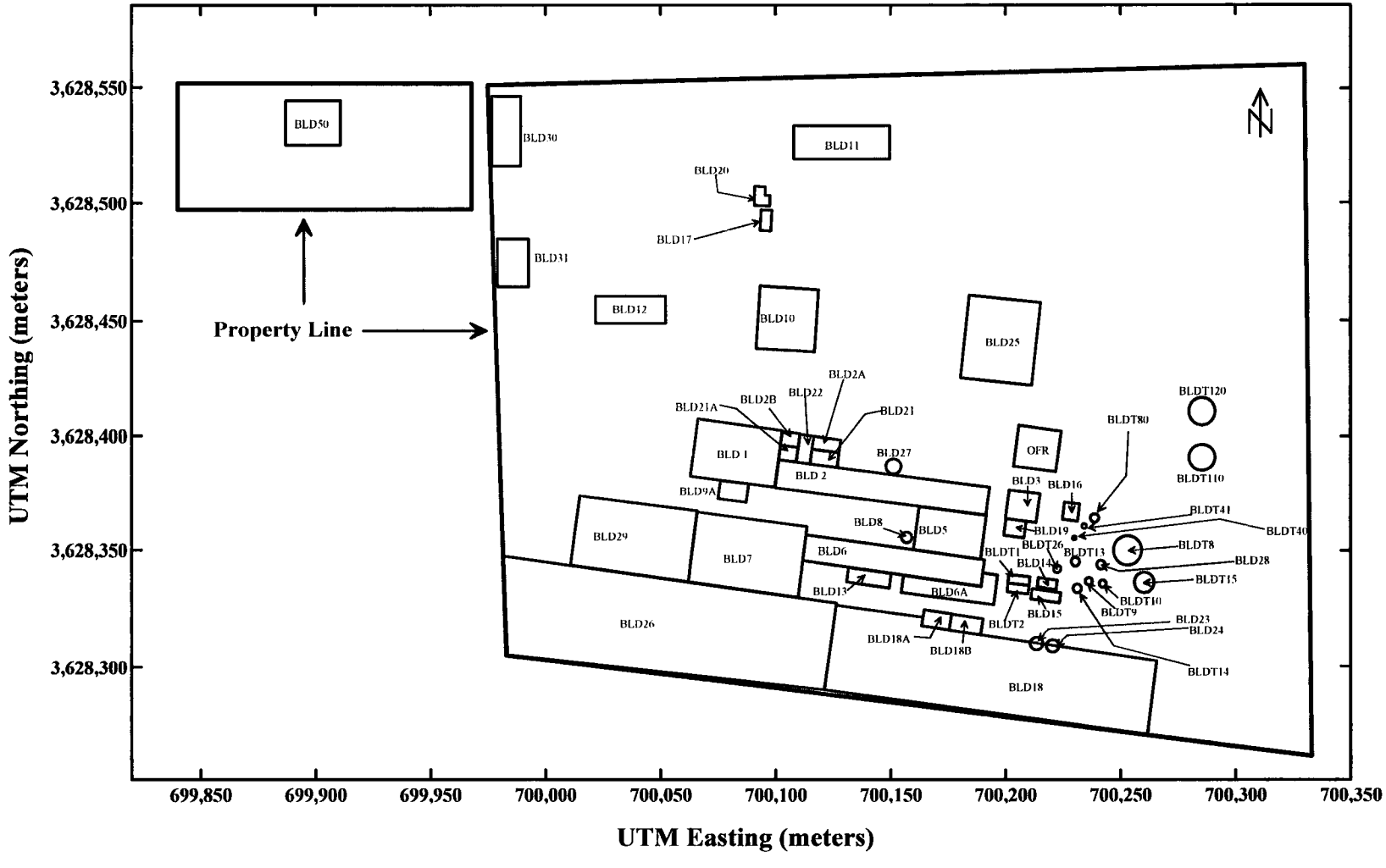
This section contains plot plans showing the locations of the Dallas Plant modeled sources, modeled downwash structures (buildings and vertical storage tanks), and property line. Figure 4-1 is a scaled plot plan of the Dallas Plant. Figure 4-2 shows the modeled downwash structures considered for the air dispersion analyses at the Dallas Plant. Figure 4-3 is an enlarged portion of the scaled plot plan showing the location of emission sources relative to various buildings. Reference UTM coordinates are in NAD 27 datum.

FIGURE 4-1. LOCATION OF MODELED PROPERTY LINE, BUILDING STRUCTURES, AND EMISSION SOURCES FOR THE GAF DALLAS PLANT



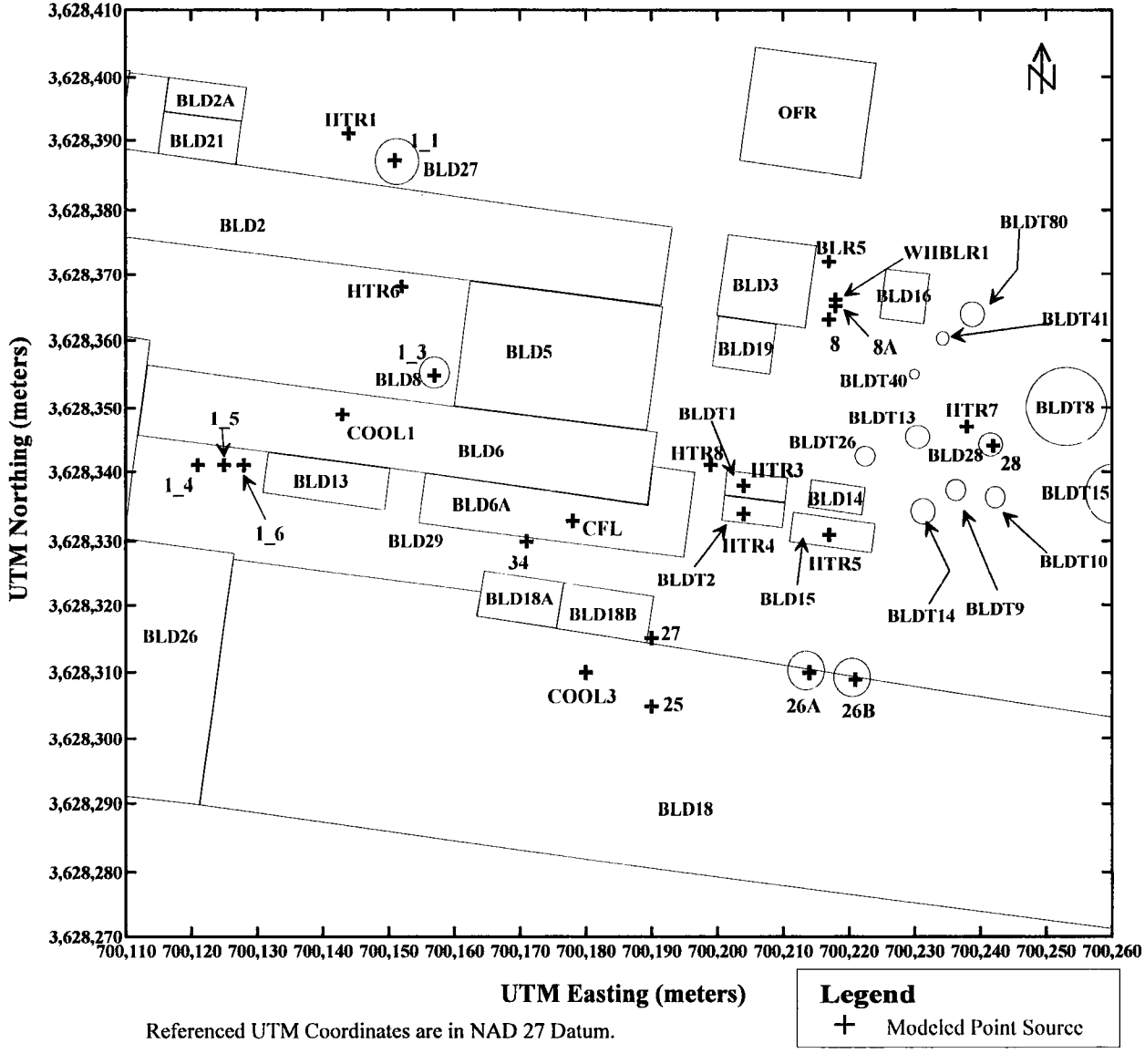
Referenced UTM Coordinates are in NAD 27 Datum.

FIGURE 4-2. LOCATION AND IDS OF MODELED BUILDING STRUCTURES FOR THE GAF DALLAS PLANT



Referenced UTM Coordinates are in NAD 27 Datum.

FIGURE 4-3. LOCATION AND EPNS OF MODELED POINT SOURCES FOR THE GAF DALLAS PLANT



Referenced UTM Coordinates are in NAD 27 Datum.

This section contains a description of the model selection, terrain, building wake effects, meteorological data, and the receptors used in the analysis presented in this report.

5.1 DISPERSION MODEL SELECTION

On November 9, 2005, the U.S. EPA promulgated American Meteorological Society / Environmental Protection Agency Regulatory Model (AERMOD) for adoption into the *Guideline on Air Quality Models (Revised)*. AERMOD was developed to replace the Industrial Source Complex Short-Term Version 3 (ISCST3) model. AERMOD includes a state-of-the-science downwash algorithm and utilizes AERMET, a meteorological data preprocessor that utilizes current planetary boundary layer (PBL) theory to calculate the dispersion coefficients (σ_y and σ_z).[22]

The most current version of the AERMOD model (version 07026) is used in conducting the air dispersion modeling analyses for the Dallas Plant. The modeling is performed using the regulatory default option, which includes the following:

- Stack-tip downwash;
- A routine for processing averages when calm wind conditions occur or when meteorological data is missing.

In accordance with U.S. EPA requirements, direction-specific building dimensions are used for the Schulman downwash algorithms. The current version of AERMOD contains algorithms for modeling the effects of aerodynamic downwash on point source emissions due to nearby buildings. The downwash algorithm is discussed in Section 5.3 of this modeling report.

5.2 TERRAIN

The base elevation in the area of the Dallas Plant property line, where the emission sources are located, is approximately 130 meters above mean sea level. The terrain elevation for each modeled downwash structure, source, and receptor is determined using United States Geological Survey (USGS) 7.5-minute Digital Elevation Model (DEM) data. The 7.5-minute USGS DEM data has terrain elevations at 30-meter intervals. The terrain height for each modeled receptor, building, and source is calculated using the AERMOD terrain preprocessor AERMAP (version 06341). AERMAP computes the terrain height from the digital terrain elevations surrounding the modeled receptors, sources, and buildings.

In addition to terrain elevation, an additional parameter called the hill height scale is required for each receptor to feed AERMOD's terrain modeling algorithms. AERMOD computes the impact at a receptor as a weighted interpolation between horizontal and terrain-following states using a critical dividing streamline approach. This scheme assumes that part of the plume mass will have enough energy to

[22] U.S. EPA, User's Guide for the AMS/EPA Regulatory Model-AERMOD, September 2004.

ascend and traverse over a terrain feature and the remainder will impinge and traverse around a terrain feature under certain meteorological conditions. The hill height scale is computed by the AERMAP terrain preprocessor for each receptor as a measure of the one terrain feature in the modeling domain that would have the greatest effect on plume behavior at that receptor.

The hill height scale does not represent the critical dividing streamline height itself, but supplies the computational algorithms with an indication of the relative relief within the modeling domain to determine the critical dividing streamline height for each hour of meteorological data.

According to Section 2.2.1 of EPA guidance, the DEM array boundary for AERMAP must include all terrain features that exceed a 10 percent elevation slope from any given receptor in order to properly calculate the hill height scale at each receptor.[23] All domain boundaries used in AERMAP processing are at least equal to or greater than the minimum that is required for proper handling of elevation slope.

5.3 BUILDING WAKE EFFECTS (DOWNWASH)

The emissions sources at the Dallas Plant are evaluated in terms of their proximity to nearby structures. The purpose of this evaluation is to determine if stack discharges may become caught in the turbulent wakes generated by these structures. AERMOD incorporates the Plume Rise Model Enhancements (PRIME) algorithms for estimating enhanced plume growth and restricted plume rise for plumes affected by building wakes.[24]

Direction-specific structure dimensions and the dominant downwash structure parameters used as input to AERMOD are determined using the *BREEZE*® BPIPP software, developed by Trinity Consultants, Inc. The software incorporates the algorithms of the U.S. EPA's sanctioned *BREEZE*® BPIP PRIME (BPIPP), version 04274.[25]

The output from the BPIPP downwash analysis lists the names and dimensions of the structures generating wake effects and the locations and heights of the affected emission sources (i.e., stacks). In addition, the output contains a summary of the dominant structure for each emissions source (considering all wind directions) and the actual structure height and projected widths for all wind directions. This information is incorporated into the AERMOD data input files.

Emission sources with a stack height less than the minimum Good Engineering Practice (GEP) stack height may be affected by downwash caused by a nearby structure. Per U.S. EPA guidance, the minimum GEP stack height is determined using the following equation.[26]

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[23] U.S. EPA, Office of Air Quality Planning and Standards, *User's Guide for the AMS/EPA Regulatory Model – AERMOD*, Research Triangle Park, North Carolina, EPA-454/B-03-001, September, 2004.

[24] L.L. Schulman, D.G. Strimaitis, and J.S. Scire, Development and Evaluation of the Prime Plume Rise and Building Downwash Model, *AWMA*, 50:378-390, 2000.

[25] U S. Environmental Protection Agency, *User's Guide to the Building Profile Input Program*, Research Triangle Park, NC, EPA-454/R-93-038.

[26] U.S. EPA, Office of Air Quality Planning and Standards, *Guidelines for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations) (Revised)*, Research Triangle Park, North Carolina, EPA 450/4-80-023R, June, 1985.

$$G = H + 1.5L$$

Where:	G	=	Minimum GEP stack height
	H	=	Height of the structure
	L	=	Lesser dimension (height or projected width of structure)

This equation is limited to stacks located within 5L of a surrounding structure. Stacks located at distances greater than 5L are not subject to the wake effects of the structure. If there is more than one stack at a given facility, the above equation must be successively applied to each stack. If more than one structure is involved, the equations must also be successively applied to each structure.

The Dallas Plant building height for each structure that is considered in the downwash analysis is provided in Table 5-1. The location and dimensions of the modeled building structures are shown in Figure 4-2.

TABLE 5-1. DOWNWASH STRUCTURE HEIGHTS

Modeled Downwash Structure ID	Modeled Downwash Structure Description	Height	
		(ft)	(m)
BLD1	Building 1	21.30	6.49
BLD2	Building 2	25.06	7.64
BLD3	Building 3	25.30	7.71
BLD5	Building 5	23.00	7.01
BLD6	Building 6	27.95	8.52
BLD6A	Building 6A	28.89	8.81
BLD7	Building 7	19.60	5.97
BLD8	Line 1 Stabilizer Use Bin	39.96	12.18
BLD9A	Building 9A	14.00	4.27
BLD10	Building 10 (Employee Center)	17.46	5.32
BLD11	Building 11 (Main Office)	18.55	5.65
BLD12	Building 12	25.17	7.67
BLD13	Building 13	53.85	16.41
BLD14	Instrument Room	8.85	2.70
BLD15	Preheater Building	7.93	2.42
BLD16	Incinerator	13.18	4.02
BLD17	Credit Union	12.66	3.86
BLD18	Building 18	35.51	10.82
BLD18A	Building 18A	49.43	15.07
BLD18B	Building 18B	68.04	20.74
BLD19	Stillyard Office	11.13	3.39
BLD20	Guard House	9.53	2.90
BLD21	Building 2 Tier 2	28.83	8.79
BLD22	Building 22	53.57	16.33
BLD23	Limestone Bin A	64.10	19.54
BLD24	Limestone Bin B	64.10	19.54
BLD25	Building 25	24.08	7.34
BLD26	Building 26	21.70	6.61
BLD27	Line 1 Filler	42.10	12.83
BLD28	Born Heater	68.63	20.92
BLD29	New Warehouse	26.00	7.92
BLDT1	Tank T-1	13.25	4.04
BLDT2	Tank T-2	13.25	4.04

TABLE 5-1. DOWNWASH STRUCTURE HEIGHT (CONT.)

Modeled Downwash Structure ID	Modeled Downwash Structure Description	Height	
		(ft)	(m)
BLDT8	Tank T-8	27.62	8.42
BLDT9	Tank T-9	27.62	8.42
BLDT10	Tank T-10	35.53	10.83
BLDT13	Tank T-13	54.10	16.49
BLDT14	Tank T-14	60.44	18.42
BLDT15	Tank T-15	27.62	8.42
BLDT80	Tank T-80 Diesel Storage Tank	24.77	7.55
BLDT26	Blowstill T-26	51.27	15.63
BLDT110	Tank T-110	32.94	10.04
BLDT120	Tank T-120	32.94	10.04
OFR	Old Fire Reservoir	14.17	4.32
BLD2A	Building 2A	21.00	6.40
BLD2B	Building 2B	21.50	6.55
BLD21A	Building 21A	21.50	6.55
BLD30	Corporate Engineering Office (old)	23.47	7.15
BLD31	Old Bilbo Garage	20.87	6.36
BLDT40	Oil Knockout Tank (Stillyard)	13.49	4.11
BLDT41	Waste Oil Tank (Stillyard)	9.12	2.78
BLD50	CARE Center	29.00	8.84

5.4 METEOROLOGICAL DATA

The EPA AERMOD program requires meteorological data preprocessed with the AERMET program. In addition to meteorological station data, three additional variables are considered when preprocessing the surface and meteorological data for a site. These variables are:

- Surface roughness,
- Albedo, and
- Bowen Ratio.

TCEQ has created county-specific preprocessed meteorological data sets using AERMET (version 06341) for use in AERMOD air dispersion modeling. The air dispersion modeling for the Dallas Plant is performed using AERMOD-ready meteorological data for Dallas County made available and approved through the TCEQ. Per TCEQ guidance, this modeling analysis is performed using year 1988 preprocessed meteorological data for the State NAAQS analyses, State Health Effect evaluation, and State Property Line analysis. The TCEQ data sets for Dallas County are based on surface observations taken from Dallas/Fort Worth (DFW – National Weather Service Station [NWS] station number 3927) and upper air measurements taken from Stephenville (SEP – NWS Station Number 13901). TCEQ has processed the meteorological data set using the Albedo and Bowen Ratio representative of Dallas County. The wind rose for year 1988 of meteorological data is provided in Figure 5-1. The surface station elevation is approximately 168 meters.

Each County specific TCEQ-provided data set processed with the AERMET program comes with three different files, each representing a different surface roughness category:

- L – low surface roughness (0.05 m)
- M – medium surface roughness (0.5 m)
- H – high surface roughness (1.0 m)

As shown in Figure 3-1, the facility is located in an urban area that includes a moderate density of existing residential and industrial structures. The typical surface roughness for this type of land use is generally between 0.1 and 0.7 m.[27]

Per EPA guidance, the appropriate values for surface roughness length (z_0) should be used in the AERMET meteorological processor to prepare the meteorological data for AERMOD.[28] The EPA recommended upwind distance for processing the land cover data to determine the effective z_0 for input to AERMET is 1 kilometer (km) relative to the meteorological tower (measurement site). However, for this modeling analysis 1 km relative to the application site (i.e., GAF Dallas Plant) is used, per TCEQ guidance, to evaluate the land cover data.[29]

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[27] AERMET.pdf (ftp://ftp.tceq.state.tx.us/pub/OPRR/APD/AERMET/AERMETv06341/BackgroundInformation/).

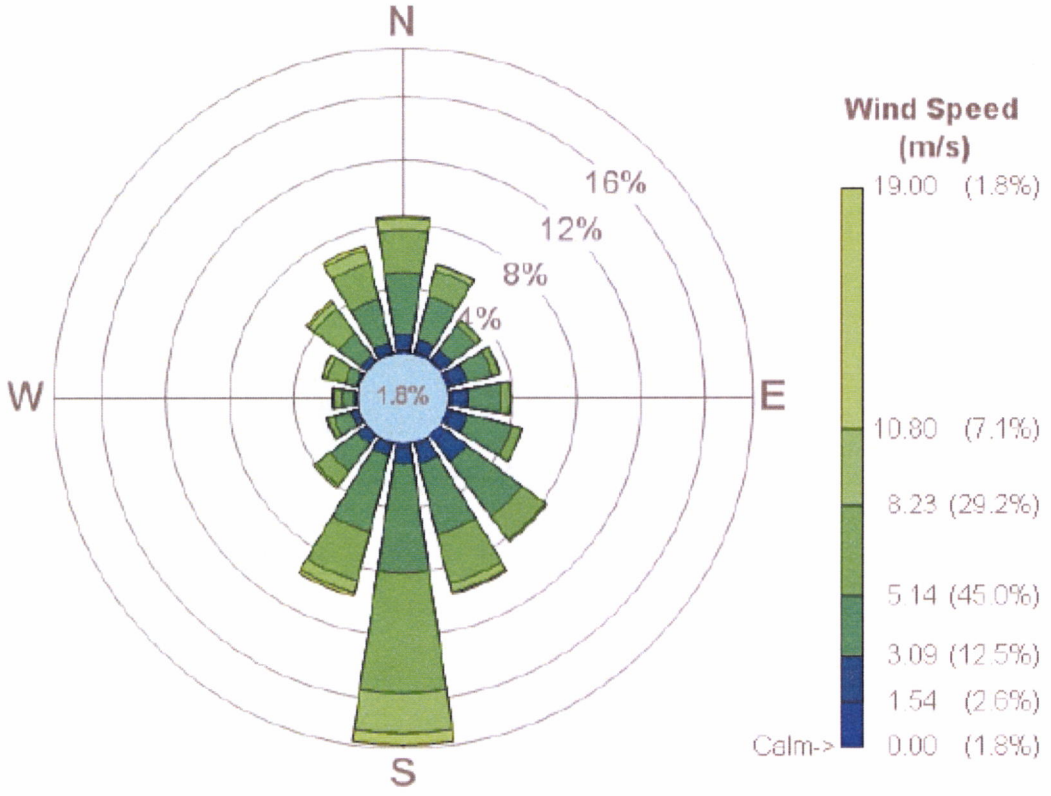
[28] EPA, AERMOD Implementation Guide, January 9, 2008.

[29] Electronic communication between Dr. Robert Opiela, TCEQ, and Anand Masuraha, Trinity Consultants, May 20, 2008.

EPA has developed a tool called AERSURFACE that can be used as an aid in determining realistic and reproducible surface characteristic values, including z_0.[30] AERSURFACE (dated 08009) is used to confirm the appropriate surface roughness data set to be used in this air dispersion modeling analysis. Individual AERSURFACE runs are performed for annual, seasonally, and monthly periods. For each run, the 1 km circle centered about the GAF Dallas Facility is divided into 12 equal radial sectors.

AERSURFACE requires the input of land cover data from U. S. Geological Survey (USGS) National Land Cover Data 1992 archives (NLCD92), which is used to determine the land cover types for the user-specified location. In this modeling analysis, the NLCD92 data is downloaded from the USGS Seamless Data Server (SDS) through the following website: http://seamless.usgs.gov/. The electronic copy of all AERSURFACE input and output files, and USGS NLCD92 map (surrounding land cover picture) are provided with this submittal. Based on the AERSURFACE output files, the TCEQ preprocessed meteorological data set corresponding to the medium surface roughness category is used in the modeling analyses.

FIGURE 5-1. FREQUENCY OF WIND SPEED AND DIRECTION FOR 1988



[30] AERSURFACE User's Guide, EPA-454/B-08-001, January 2008.

5.5 RECEPTOR GRIDS

In the air dispersion modeling, ground-level concentrations are calculated within five receptor grids. These five grids cover a region extending approximately 10 km from all edges of the Dallas Plant property line. Receptor grids near the modeled facility require closer spacing to ensure the highest concentration is captured. In most situations, the maximum concentrations are found on or near a facility's property line. For this dispersion modeling analysis, the receptor grids are defined as follows:

1. The "property line grid" is a discrete receptor grid with the receptors spaced at 25-m intervals along the property line.
2. The "tight grid" contains 25-m spaced receptors extending approximately 300 m from the property line exclusive of the receptors within the property line.
3. The "fine grid" contains 100-m spaced receptors extending approximately 300 m to 1 km from the property line.
4. The "medium grid" contains 500-meter spaced receptors extending approximately 1 km to 5 km from the property line.
5. The "coarse grid" contains 1,000-meter spaced receptors extending approximately 5 km to 10 km from the property line.

In addition to the above mentioned receptor grids, GAF has identified five sensitive receptor locations within 3,000 feet of each side of the property line. Per TCEQ guidance, a sensitive receptor is defined as "a nonindustrial receptor such as a school, residence, recreational area, commercial or business office, land used for agriculture, hospital, day-care center, or church. Other types include roads, railroads, rights-of-way, waterways, or the like; public exposure at these other types of receptors is less likely than at other sensitive receptors."[31] These sensitive receptor locations are shown in Figure 3-1 of this report and were added as five discrete receptors in the modeling analysis in addition to the five receptor girds. These five sensitive receptor locations are:

- Edison Learning Center (Dallas Independent School District)
- Canterbury Episcopal School
- LG Pinkston High school
- Sequoyah Learning Center
- George W Carver Learning Center

For the full impact State NAAQS analysis, modified receptor grids containing all the receptors within the ROI for the applicable averaging period were modeled. This approach is used for the PM_{10} (annual) and SO_2 (24-hour) State NAAQS Analysis. The complete receptor grid is used in the State Property Line Analysis and the State Health Effects Analysis.

[31] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999.

6. MODELING SOURCE CHARACTERIZATION AND INVENTORY

The following sections discuss the GAF Dallas Plant emission sources, source characterization methodologies, and the methodology for obtaining the inventory of nearby off-property industrial emission sources that are included in the air quality dispersion modeling analyses. The emissions of all criteria pollutants and asphalt vapor in tons per year (tpy) and pounds per hour (lb/hr) for each of the Dallas Plant emission sources were obtained from the TCEQ Table 1(a).[32] A copy of the TCEQ Table 1(a) is provided in the Appendix A of this modeling report.

6.1 GAF DALLAS FACILITY SOURCES

The TCEQ permit amendment application explains the methodology for calculating the emissions in tons per year (tpy) and pounds per hour (lb/hr) for each of the Dallas Plant emission sources. Modeled emission rates for all the criteria pollutants and asphalt vapor are the same as those included in the permit application, except for nitrogen dioxide (NO_2). The permit allowable emission rates for oxides of nitrogen (NO_X) are multiplied by 0.75 to convert to NO_2 emission rates for air dispersion modeling purposes, per the Ambient Ratio Method.[33]

All sources are modeled as point or volume sources. All sources with vertical momentum are modeled as point sources, and all fugitive emissions sources are modeled as volume sources. Sections 6.1.1 through 6.1.2 provide a thorough justification on the Dallas Plant's source parameters and modeled source types.

Tables B-1 in Appendix B summarizes the Dallas Plant modeled source EPN names, modeled IDs, UTMs, and associated source parameters for each emission source. The emission rates for all modeled criteria pollutants and asphalt vapor are summarized in Table B-2 and Table B-3 in Appendix B.

6.1.1 POINT SOURCES

In the modeling analyses, heaters, cooling sections, and baghouses with vertical discharge are modeled as point sources. Modeled temperature, velocity, and diameter values for these sources are obtained from Table 1(a) in Appendix A. The release height is calculated based on the vertical stack height above ground level elevation. The locations of the modeled point sources are shown in Figure 4-3.

6.1.2 VOLUME SOURCES

In the air dispersion modeling analyses, the plant-wide fugitive source (EPN: FUG1) is modeled as a volume source. As a conservative estimate, the release height is set to be half of the height of the shortest building on site. The estimated length and width of EPN FUG1 is approximately 1,049 ft (319.6 m) and 801 ft (244.0 m), respectively. According to EPA guidance for AERMOD, the initial lateral dimension (σ_{y0}) of a single volume source is set

[32] TCEQ Air Quality Permit Amendment Application, GAF Materials Corporation, Dallas Plant, December 2008.
[33] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Appendix B.

equal the side length divided by 4.3.[34] Therefore, σ_{y0} is calculated based on the side length of a square of equivalent area to EPN FUG1, divided by 4.3. The initial vertical dimension (σ_{z0}) is calculated per EPA guidance (for surfaced based sources and elevated sources on or adjacent to a building) as the volume height divided by 2.15. The location of the modeled volume source is shown in Figure 4-1.

6.1.3 SOURCE GROUPS

Per the December 2008 TCEQ Air Quality Permit Amendment application for the GAF Dallas Plant, the hot exhaust gases from the thermal oxidizer are either vented to the atmosphere from the *thermal oxidizer exhaust* stack (EPN 8) or are ducted to a *waste heat recovery boiler* (EPN 8A) to produce steam for the Dallas Plant.[35] Similarly, emissions from Line 1 and Line 3 Asphalt Coaters can be routed to either the *coalescing filter mist elimination systems* (EPN CFL) or the back-up *electrostatic precipitator* (EPN 34).

For each refined modeling analysis presented in this modeling report, scenarios are modeled, using the AERMOD source group option, to account for each different release path combination between EPN 8 and EPN 8A and between EPN CFL and EPN 34. The GLC_{max} obtained for each source group (scenario) is compared with the applicable standard or guideline value. Tables 6-1 and 6-2 provide a description of each modeled scenario.

TABLE 6-1. SOURCE GROUP SCENARIOS FOR PM_{10} AND ASPHALT VAPOR REFINED MODELING

Source Group	Source Group Description
Scenario 1	EPNs CFL and 8A with all other EPNs[1]
Scenario 2	EPNs CFL and 8 with all other EPNs[1]
Scenario 3	EPNs 34 and 8A with all other EPNs[1]
Scenario 4	EPNs 34 and 8 with all other EPNs[1]

[1] When EPN 8A is included in the source group, EPN 8 is excluded and vice versa. When EPN CFL is included in the source group, EPN 34 is excluded and vice versa.

TABLE 6-2. SOURCE GROUP SCENARIOS FOR SO_2 REFINED MODELING

Source Group	Source Group Description
Scenario 1	EPN 8A with all other EPNs[1]
Scenario 2	EPN 8 with all other EPNs[1]

[1] When EPN 8A is included in the source group, EPN 8 is excluded and vice versa.

For the screening modeling, the worst-case process stack between EPN 8 and EPN 8A based on the higher normalized impact is considered for each averaging period for CO (1-hour and 8-hour) and NO_2 (annual) State NAAQS demonstration.

[34] Table 3-1, User's Guide for the AMS/ EPA Regulatory Model-AERMOD, EPA-454/B-03-001, September 2004.

[35] Section 7.2, TCEQ Air Quality Permit Amendment Application, GAF Materials Corporation, Dallas Plant, December 2008.

6.2 OFF-PROPERTY INVENTORY SOURCES FROM TCEQ PSDB

The current inventories of maximum allowable emission rates for industrial sources within the ROI were obtained from the TCEQ Point Source Data Base (PSDB) for use in the State NAAQS analysis. The secondary search option was selected for the inventory sources. A PSDB retrieval was requested from the Information Resources Division of the TCEQ to obtain a current list of off-property inventory sources.

The TCEQ-provided PSDB retrieval contains data for both point and fugitive sources, as well as electronic model ready input files for the point sources.[36] Fugitive source (area source) data were manually entered into the model.

Some TCEQ-provided PSDB inventory source parameters and emission rates are updated based on TCEQ guidance.[37] The changes to the TCEQ inventory sources are as follows:

- All sources with zero diameters and/or zero velocities are modeled as pseudo-point sources with the following parameters:
  - Velocity = 0.001 m/s
  - Diameter = 0.001 m
  - Temperature = 0 K
- All fugitive sources are modeled as area sources with the parameters provided in the PSDB inventories.

The TCEQ PSDB inventories for SO_2 and PM_{10} obtained from TCEQ are included in electronic format with this submittal.

[36] PM_{10} retrieval was obtained through electronic communication between Mr. Robert Organ, TCEQ, and Ms. Jacquie Hui, Trinity Consultants, on November 6, 2008; SO_2 retrieval was obtained through electronic communication between Mr. Jimmy Perry, TCEQ, and Ms. Jacquie Hui, Trinity Consultants, on November 17, 2008.

[37] TCEQ, *Air Quality Modeling Guidelines*, RG-25 (Revised), February 1999, Appendix H.

The following sections discuss the AERMOD air dispersion modeling results for the State NAAQS Analysis, State Health Effect Evaluation, and State Property Line Analysis. Compliance with applicable standards and guidelines is also discussed.

7.1 STATE NAAQS MODELING RESULTS

The Significance Analysis and State NAAQS Analysis modeling results are discussed in the following subsections:

7.1.1 SIGNIFICANCE ANALYSIS

As described in Section 2.1.1 of this modeling report, the Significance Analysis for CO and NO_2 is conducted using a ratio technique screening approach with a unit emission rate ($\mu g/m^3$ per lb/hr). Refined modeling was conducted for the SO_2 and PM_{10} Significance Analysis. The results are described below.

7.1.1.1 SCREENING MODELING RESULTS

The AERMOD modeled normalized impacts for each averaging period and each EPN that emits criteria pollutants used for the State NAAQS Analysis are shown in Table C-1 in Appendix C. Table C-2 in Appendix C shows the proposed hourly site-wide CO and NO_2 emissions, and provides the calculation of the total site-wide GLC_{max} for CO and NO_2 obtained using the ratio modeling technique.

Table C-3 in Appendix C compares the resulting GLC_{max} for CO and NO_2 with the corresponding MSL. As can be seen in Table C-3, the GLC_{max} for CO (1-hour and 8-hour averaging periods) is less than the corresponding MSLs. Therefore, no further evaluation is required for CO. Further evaluation is required for NO_2 because the GLC_{max} is greater than the MSL for NO_2.

As described in Section 2.1.1.1, since the GLC_{max} from the NO_2 Significance Analysis is greater than the applicable MSL, the monitored background concentration, shown in Table 2-1, is added to the GLC_{max} result and compared to 90 percent of the State NAAQS. As can be seen in Table C-3 in Appendix C, the GLC_{max} including the monitored background concentration for NO_2 is less than 90 percent of the State NAAQS. Therefore, compliance with the State NAAQS for NO_2 is demonstrated.

7.1.1.2 REFINED MODELING RESULTS

As described in Section 2.1.1.2, refined site-wide AERMOD air dispersion modeling is performed for SO_2 (3-hour, 24-hour, and annual averaging periods) and PM_{10} (24-hour and annual averaging periods) with the proposed hourly emission

rates from each source. The proposed emissions from each source are shown in Table B-2 (in lb/hr and tpy) in Appendix B.

As noted in Section 6.1.3 of the modeling report, the combinations (i.e., scenarios) of emission paths between EPN 8 and EPN 8A and between EPN CFL and EPN 34 are considered for each modeled averaging period using the source group option in AERMOD.

Table C-3 in Appendix C compares the GLC_{max} for SO_2 and PM_{10} for all scenarios obtained from the refined site-wide modeling with the corresponding MSLs. As can be seen in Table C-3, further evaluation is required for SO_2 and PM_{10} because the GLC_{max} for all averaging periods for both pollutants is greater than the corresponding MSLs.

As described in Section 2.1.1.2, since the GLC_{max} from the SO_2 and PM_{10} Significance Analysis is greater than the applicable MSLs, the background concentration is added to the GLC_{max} result for each averaging period and compared to 90 percent of the State NAAQS. As can be seen in Table C-3, the resultant concentrations (summation of the GLC_{max} and background concentration) for the SO_2 3-hour and annual averaging periods and the PM_{10} 24-hour averaging period are less than 90 percent of the corresponding NAAQS. Therefore, compliance with the State NAAQS for the SO_2 3-hour and annual averaging periods and the PM_{10} 24-hour averaging period is demonstrated.

Since the maximum modeled concentrations for the SO_2 24-hour averaging period and the PM_{10} annual averaging period are greater than 90 percent of the corresponding NAAQS, a Full Impact Analysis for these pollutants and averaging periods is performed as discussed in Section 7.1.2.

7.1.2 Full Impact Analysis

A Full Impact Analysis is performed for SO_2 (24-hour averaging period) and PM_{10} (annual averaging period).

7.1.2.1 Radius of Significant Impact

The first step in the Full Impact Analysis is to determine the ROI. The refined modeling results for SO_2 and PM_{10} from the Significance Analysis are reviewed to determine the furthest receptor from the facility at which the modeled concentration exceeds an MSL. The following ROIs are determined for the Full Impacts Analyses, considering all modeled scenarios:

- SO_2 (3-hour) – 1.55 km
- SO_2 (24-hour) – 1.55 km
- SO_2 (annual) – 1.24 km
- PM_{10} (24-hour) – 1.84 km

- PM_{10} (annual) – 1.23 km

The largest ROI among all averaging periods for a particular pollutant is selected as the ROI for that pollutant. In determining which inventory sources should be included in the Full Impact Analysis, the U.S. EPA requires that at least all sources within the impact area (the circular area that circumscribes the ROI) should be evaluated. The resulting area is defined as the Area of Impact (AOI). For this analysis, a conservative (i.e., larger than required) AOI with a radius of 10 km for SO_2 and 5 km for PM_{10} were used in the PSDB inventory retrieval.

7.1.2.2 RECEPTOR GRIDS

The receptor grids for the Full Impact Analysis for SO_2 (24-hour averaging period) and PM_{10} (annual averaging period) are modified from the MSL receptor grid to include at least all receptors within the ROI for the applicable averaging period.

7.1.2.3 INVENTORY SOURCES

The SO_2 and PM_{10} inventory sources were obtained by using the methodology discussed in Section 6.2 of this modeling report for the AOI described in Section 7.1.2.1.

7.1.2.4 FULL IMPACT STATE NAAQS ANALYSIS

Similar to the refined Significance Analysis, the Full Impact analysis is performed with combinations of emission paths between EPN 8 and EPN 8A and between EPN CFL and EPN 34 for each modeled averaging period using the source group option in AERMOD as noted in Section 6.1.3. The emissions from the Dallas Plant are modeled simultaneously with the SO_2 and PM_{10} emissions from the inventory sources provided by the TCEQ PSDB retrieval. The background concentrations, shown in Table 2-1, are then added to the maximum modeled concentrations for the SO_2 24-hour averaging period and the PM_{10} annual averaging period. The resulting total concentrations are then compared to the corresponding NAAQS.

The results of the Full Impact State NAAQS Analysis are presented in Table C-4 in Appendix C. As can be seen in Table C-4, the total maximum ground level concentration (Dallas Plant sources plus near-by source inventory) including the background concentration for SO_2 (24-hour) and PM_{10} (annual) is less than the corresponding NAAQS values for all scenarios. Therefore, compliance with the State NAAQS for the SO_2 24-hour averaging period and the PM_{10} annual averaging period is demonstrated.

7.2 STATE HEALTH EFFECT EVALUATION

As described in Section 2.2 of this modeling report, a refined AERMOD modeling analysis is conducted for asphalt vapor (1-hour and annual averaging periods) for the State Health Effects evaluation. The

modeled asphalt vapor emissions from each EPN are shown in Table B-3 (in lb/hr and tpy) in Appendix B. Note that the short-term emission rates are modeled for both the 1-hour and annual averaging periods.

As noted in Section 6.1.3 of the modeling report, the combinations of emission paths between EPN 8 and EPN 8A and between EPN CFL and EPN 34 are considered for each modeled averaging period using the source group option in AERMOD.

Table 7-1 shows the hourly and annual GLC_{max} results for asphalt vapor based on the refined modeling analysis and compares the GLC_{max} with the corresponding ESL values. As shown in Table 7-1, the hourly and annual GLC_{max} values for asphalt vapor are less than their corresponding ESLs. Therefore, no further evaluation for the State Health Effect review is required.

TABLE 7-1. MAXIMUM CONCENTRATIONS CALCULATED IN THE STATE HEALTH EFFECTS ANALYSIS FOR ASPHALT VAPOR

Pollutant	Year	Averaging Period	Source Group	UTM Coordinate East (m)	UTM Coordinate North (m)	Maximum Modeled Concentration[2] ($\mu g/m^3$)	TCEQ ESL ($\mu g/m^3$)	Total Concentration < TCEQ ESL
Asphalt Vapor	1988	1-Hour	Scenario 1	700,181	3,628,280	336.34	350	Yes
			Scenario 2	700,181	3,628,280	336.33		
			Scenario 3	700,281	3,628,268	202.40		
			Scenario 4	700,281	3,628,268	202.40		
		Annual	Scenario 1	700,181	3,628,280	24.83	35	Yes
			Scenario 2	700,181	3,628,280	24.83		
			Scenario 3	700,206	3,628,277	10.10		
			Scenario 4	700,206	3,628,277	10.12		

[1] When EPN 8A is included in the source group, EPN 8 is excluded and vice versa. When EPN CFL is included in the source group, EPN 34 is excluded and vice versa. All other EPNs are included in all scenarios. Scenario 1 includes CFL and 8A, Scenario 2 includes CFL and 8, Scenario 3 includes EPN 34 and 8A, and Scenario 4 includes EPN 34 and 8.

[2] The high first high (H1H) is used for the 1-hour averaging period.

7.3 STATE PROPERTY LINE ANALYSIS

As discussed in Section 2.3 of this modeling report, a refined AERMOD modeling analysis is conducted for the SO_2 State Property Line analysis. As noted in Section 6 of the modeling report, the combinations of emission paths between EPN 8 and EPN 8A are considered using the source group option in AERMOD. The refined SO_2 (1-hour) results are shown in Table 7-2 below.

TABLE 7-2. MAXIMUM MODELED CONCENTRATIONS FOR THE STATE PROPERTY LINE ANALYSIS

Pollutant	Year	Averaging Period	Source Group [1]	UTM Coordinate East (m)	UTM Coordinate North (m)	Maximum Modeled Concentration[2] ($\mu g/m^3$)	TCEQ Standard ($\mu g/m^3$)	Total Concentration < TCEQ Standard
Sulfur Dioxide (SO_2)[3]	1988	1-Hour	Scenario 1	700,240	3,628,237	676.18	1,021	Yes
			Scenario 2	700,265	3,628,237	471.90	1,021	Yes

[1] When EPN 8A is included in the source group, EPN 8 is excluded and vice versa. Scenario 1 includes 8A with all other EPNs and Scenario 2 includes 8 with all other EPNs.

[2] High 1st High (H1H).

[3] Per TCEQ guidance, maximum modeled ground-level concentration for the 1-hour averaging period is used for comparison with the 30-minute standard.

As shown in Table 7-2, compliance with the State Property Line standard for SO_2 is demonstrated.

8. ELECTRONIC FILES

The CD provided in this modeling report contains all of the AERMOD air dispersion modeling analysis input and output electronic data files used to generate the results presented in this report. The CD also includes the meteorological data and downwash files that are used in the modeling analysis.

The electronic data files include the following:

- All AERMOD input and output files
- All BPIPP input and output data files
- Meteorological files
- The boundary files specifying coordinates of the property line (propln.bln)
- State Air Quality Dispersion Modeling Analysis report
- AERSURFACE input and output files, NLCD92 map
- TCEQ PSDB Retrieval (for SO_2 and PM_{10})

The following tables summarize the electronic files included in the attached file.

TABLE 8-1. AERMOD INPUT AND OUTPUT DATA FILE DESCRIPTIONS FOR THE AIR DISPERSION MODELING ANALYSIS

Pollutant	File Name	Averaging Period	Associated Files	File Description	Receptor Grid
Generic	GND88.zip	1-hour, 3-hour, 8-hour, 24-hour, and annual	Input File (*.ami) Output File (*.aml)	Generic Modeling analysis with 1988 meteorological data and unit emission rate for each EPN	Property Line, Tight, Fine, Medium, and Coarse grids, including five sensitive receptor locations
PM_{10}	PND88.zip	24-hour and annual	Input File (*.ami) Output File (*.aml) Plot Files - 24-hour and Annual (*.plt)	PM_{10} Significance Modeling analysis with 1988 meteorological data with proposed PM_{10} emissions for each source with four scenario source groups	
SO_2	SND88.zip	1-hour, 3-hour, 24-hour, and annual	Input File (*.ami) Output File (*.aml) Plot Files – 1-hour, 3-hour, 24-hour, and Annual (*.plt)	SO_2 Significance Modeling analysis and State Property Line analysis with 1988 meteorological data with proposed SO_2 emissions for each source with two scenario source groups	
Asphalt Vapor	ATD88.zip	1-hour and annual	Input File (*.ami) Output File (*.aml) Plot Files - 1-hour and Annual (*.plt)	Asphalt vapor State Health Effect evaluation with 1988 meteorological data source with four scenario source groups	
PM_{10}	PFNE88.zip	Annual	Input File (*.ami) Output File (*.aml) Plot Files - Annual (*.plt)	PM_{10} State NAAQS Full Impact Modeling analysis with 1988 meteorological data with GAF Sources and nearby PM_{10} source inventories with four scenario source groups	Receptors within the ROI in the Significance Analyses for each applicable averaging period
SO_2	SFNE88.zip	24-hour	Input File (*.ami) Output File (*.aml) Plot Files – 24-hour (*.plt)	SO_2 State NAAQS Full Impact Modeling analysis with 1988 meteorological data with GAF Sources and nearby SO_2 source inventories with two scenario source groups	

TABLE 8-2. METEOROLOGICAL DATA FILES USED FOR THE AERMOD MODELING ANALYSIS FOR YEAR 1988

File Name	Description
DFWS88BM.SFC	Surface meteorological file
DFWS88BM.PFL	Upper air meteorological file

TABLE 8-3. DOWNWASH FILES USED FOR THE MODELING ANALYSIS

Input File Name	Output File Name	
Bpip input file	Bpip output file	Bpip summary file

TABLE 8-4. OTHER FILES USED FOR THE AIR QUALITY DISPERSION MODELING ANALYSIS

File Description	File Name
GAF property line boundary file	propln.bln
GAF Air Quality Dispersion Modeling Analysis report	State Air Quality Dispersion Modeling Analysis (050509).pdf
AERSURFACE input and output files, NLCD92 map	"ASERSURFACE Input and Output Files & NLCD92 Map" folder
TCEQ PSDB Retrieval files	"TCEQ PSDB Retrieval" folder

APPENDIX A: TABLE 1(A)

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Table 1(a) Emission Point Summary

Date	12/17/2008	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
			SO_2	0.01	0.01
			PM_{10}	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
			SO_2	0.01	0.01
			PM_{10}	0.01	0.02
			CO	0.04	0.18
			VOC	0.01	0.01
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	NO_x	0.10	0.43
			SO_2	0.01	0.01
			PM_{10}	0.01	0.03
			CO	0.08	0.36
			VOC	0.01	0.02
BLR5	BLR5	Stand-by Boiler Vent	NO_x	3.73	0.90
			SO_2	0.02	<0.01
			PM_{10}	0.28	0.07
			CO	3.13	0.75
			VOC	0.20	0.05

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Table 1(a) Emission Point Summary

Date	12/17/2008	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
8	TO1	Thermal Oxidizer Exhaust Stack	NO_x	1.90	8.31
8A	8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	SO_2	29.35	128.55
			PM_{10}	2.62	11.46
			CO	11.34	49.65
			VOC	0.09	0.37
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	NO_x	0.47	2.06
			SO_2	0.01	0.04
			PM_{10}	0.11	0.48
			CO	1.24	5.43
			VOC	0.08	0.35
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	PM_{10}	0.63	2.76
			VOC	5.76	25.23
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Stk	PM_{10}	0.23	1.01
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM_{10}	0.03	0.13

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Table 1(a) Emission Point Summary

Date	12/17/2008	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM_{10}	0.59	2.58
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM_{10}	0.59	2.58
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM_{10}	0.59	2.58
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	PM_{10}	8.52	37.30
			VOC	1.65	7.23
25	25	Sand Application Baghouse	PM_{10}	1.50	6.57
26A	26A	Stabilizer Storage Baghouse A	PM_{10}	0.15	0.70
26B	26B	Stabilizer Storage Baghouse B	PM_{10}	0.29	1.26
27	27	Stabilizer Heater Baghouse	PM_{10}	0.09	0.40
28	28	Asphalt Heater	NO_x	0.59	2.60
			SO_2	0.004	0.02
			PM_{10}	0.04	0.20
			CO	0.50	2.20
			VOC	0.03	0.10
FUG1	FUG1	Plantwide Fugitive Emissions	PM_{10}	0.91	3.97
			VOC	0.43	1.88

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Table 1(a) Emission Point Summary

Date	12/17/2008	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA					
1. Emission Point			2. Component of Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		Pounds per Hour (A)	TPY (B)
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	PM_{10}	6.74	29.52
			VOC	2.76	12.09
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO_x	0.60	2.58
			SO_2	0.01	0.02
			PM_{10}	0.05	0.20
			CO	0.49	2.16
			VOC	0.03	0.14

EPN = Emission Point Number
FIN = Facility Identification Number

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Table 1(a) Emission Point Summary

Date	12/17/2008	Permit No.:	7711A	Regulated Entity No.:	100788959
Area Name:	GAF Materials Corporation, Dallas Facility			Customer Reference No.:	602717464

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this table

AIR CONTAMINANT DATA			EMISSION POINT DISCHARGE PARAMETERS										
1. Emission Point			4. UTM Coordinates of Emission Point			5. Building Height (Feet)	6. Height Above Ground (Feet)	7. Stack Exit Data			8. Fugitives		
(A) EPN	(B) FIN	(C) NAME	Zone	East (Meters)	North (Meters)			(A) Diameter (Feet)	(B) Velocity (fps)	(C) Temperature (°F)	(A) Length (F)	(B) Width (Ft)	(C) Axis Degrees
HTR3	HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,338		22.04	1.00	18.00	200			
HTR4	HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	14	700,204	3,628,334		22.04	1.00	18.00	200			
HTR5	HTR5	Asphalt Heater for T-14 and T-15 coating Asphalt Storage and Coating Feed Loop	14	700,217	3,628,331		29.68	2.00	30.00	570			
BLR5	BLR5	Stand-by Boiler Vent	14	700,217	3,628,372		31.79	2.04	50.00	1000			
8	TO1	Thermal Oxidizer Exhaust Stack	14	700,217	3,628,363		36.99	2.03	182.24	1460			
8A	8A	Thermal Oxidizer Exhaust thru Waste Heat Boiler Stack	14	700,218	3,628,365		35.87	3.94	48.38	583			
WHBLR 1	WHBLR 1	Waste Heat Recovery Boiler Natural Gas Burner Side	14	700,218	3,628,366		36	2.00	14.73	410			
CFL	CFL	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	14	700.178	3,628,333		40.77	2.40	32.14	103			
1-1	1-1	Line 1 Stabilizer Storage and Heater Baghouse Stk	14	700,151	3,628,387		44.1	0.80	92.00	96			
1-3	1-3	Line 1 Stabilizer Use Bin Baghouse Stack	14	700,157	3,628,355		43.96	0.84	92.00	200			
1-4	1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	14	700,121	3,628,341		23.53	2.21	123.00	76			
1-5	1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	14	700,125	3,628,341		23.53	2.21	92.00	76			
1-6	1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	14	700,128	3,628,341		23.53	2.21	123.00	76			
COOL1 (total 3 stks)	COOL1 (total 3 stks)	Line 1 Cooling Section	14	700,143	3,628,349		64.27	5.00	32.00	84			
25	25	Sand Application Baghouse	14	700,190	3,628,305		61.23	3.90	65.00	100			
26A	26A	Stabilizer Storage Baghouse A	14	700,214	3,628,310		73.35	0.65	59.00	Ambient			
26B	26B	Stabilizer Storage Baghouse B	14	700,221	3,628,309		73.35	0.65	59.00	Ambient			
27	27	Stabilizer Heater Baghouse	14	700,190	3,628,315		37.08	1.32	35.00	200			
28	28	Asphalt Heater	14	700,242	3,628,344		68.63	2.00	30.00	700			
FUG1	FUG1	Plantwide Fugitive Emissions	14	700,160	3,628,400		--	--	--	--	1048.56	800.52	--
COOL3 (total 3 stks)	COOL3 (total 3 stks)	Line 3 Cooling Section	14	700,180	3,628,310		73	5.00	32.00	84			
HTR6	HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	14	700,152	3,628,368		39.13	3.00	30.00	700			

EPN = Emission Point Number
FIN = Facility Identification Number

APPENDIX B: MODELED SOURCE PARAMETERS AND EMISSIONS

Table B-1. Modeled Sources Locations and Parameters

EPN	Modeled Source ID	Modeled Source Type	Modeled Source Description	UTM Coordinates East (m)	UTM Coordinates North (m)	Modeled Release Height (ft)	Modeled Release Height (m)	Source Parameters Modeled Source Temperature (F)	Source Parameters Modeled Source Temperature (K)	Source Parameters Modeled Source Velocity (fps)	Source Parameters Modeled Source Velocity (m/s)	Source Parameters Modeled Source Diameter (ft)	Source Parameters Modeled Source Diameter (m)	Source Parameters Initial Lat. Dim. (m)	Source Parameters Initial Vert. Dim. (m)
25	25	POINT	Sand Application Baghouse	700,190	3,628,305	61	18.66	100	310.93	65	19.81	3.90	1.19	-	-
26A	26A	POINT	Stabilizer Storage Baghouse A	700,214	3,628,310	73	22.36	Ambient	0.00	59	17.98	0.65	0.2	-	-
26B	26B	POINT	Stabilizer Storage Baghouse B	700,221	3,628,309	73	22.36	Ambient	0.00	59	17.98	0.65	0.2	-	-
27	27	POINT	Stabilizer Heater Baghouse	700,190	3,628,315	37	11.3	200	366.48	35	10.67	1.32	0.4	-	-
28	28	POINT	Asphalt Heater	700,242	3,628,344	69	20.92	700	644.26	30	9.14	2.00	0.61	-	-
CFL	CFL	POINT	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3	700,178	3,628,333	41	12.43	103	312.59	32	9.79	2.40	0.73	-	-
34	34	POINT	ESP [Backup to CFL (CECO Filters)]	700,171	3,628,330	43	13.05	125	324.82	53	16.15	3.15	0.96	-	-
8	8	POINT	Thermal Oxidizer Exhaust Stack	700,217	3,628,363	37	11.27	1,460	1066.48	182	55.55	2.03	0.62	-	-
8A	8A	POINT	Thermal Oxidizer Exhaust thru Waste Heat Boiler	700,218	3,628,365	36	10.93	583	579.26	48	14.75	3.94	1.2	-	-
WHBLR 1	WHBLR 1	POINT	Waste Heat Recovery Boiler Natural Gas Burner	700,218	3,628,366	36	10.97	410	483.15	15	4.49	2.00	0.61	-	-
COOL3 (total 3 stks)	COOL3	POINT	Line 3 Cooling Section	700,180	3,628,310	73	22.25	84	302.04	32	9.75	5.00	1.52	-	-
1-1	1-1	POINT	Line 1 Stabilizer Storage and Heater Baghouse Stk	700,151	3,628,387	44	13.44	96	308.71	92	28.04	0.80	0.24	-	-
1-3	1-3	POINT	Line 1 Stabilizer Use Bin Baghouse Stack	700,157	3,628,355	44	13.40	200	366.48	92	28.04	0.84	0.26	-	-
1-4	1-4	POINT	Line 1 Surfacing Section Dust Collector No. 1 Stack	700,121	3,628,341	24	7.17	76	297.59	123	37.49	2.21	0.67	-	-
1-5	1-5	POINT	Line 1 Surfacing Section Dust Collector No. 2 Stack	700,125	3,628,341	24	7.17	76	297.59	92	28.04	2.21	0.67	-	-
1-6	1-6	POINT	Line 1 Surfacing Section Dust Collector No. 3 Stack	700,128	3,628,341	24	7.17	76	297.59	123	37.49	2.21	0.67	-	-
HTR1	HTR1	POINT	Heatec	700,144	3,628,391	17	5.29	469	515.93	21	6.33	2.00	0.61	-	-
BLR5	BLR5	POINT	Stand-by Boiler Vent	700,217	3,628,372	32	9.69	1,000	810.93	50	15.24	2.04	0.62	-	-
COOL1 (total 3 stks)	COOL1	POINT	Line 1 Cooling Section	700,143	3,628,349	64.27	19.59	84	302.04	32	9.75	5.00	1.52	-	-
HTR3	HTR3	POINT	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,338	22	6.72	200	366.48	18	5.49	1.00	0.3	-	-
HTR4	HTR4	POINT	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	700,204	3,628,334	22	6.72	200	366.48	18	5.49	1.00	0.3	-	-
HTR5	HTR5	POINT	Asphalt Heater for T-14 and T-15 coating Asphalt	700,217	3,628,331	30	9.05	570	572.04	30	9.14	2.00	0.61	-	-
HTR6	HTR6	POINT	Line 3 Stabilizer Thermal Fluid Heater Vent	700,152	3,628,368	39	11.93	700	644.26	30	9.14	3.00	0.91	-	-
HTR7	HTR7	POINT	Asphalt flux heater	700,238	3,628,347	18	5.33	475	519.26	13	4.06	1.50	0.46	-	-
HTR8	HTR8	POINT	Filled coating heat exchanger heater	700,199	3,628,341	18	5.33	475	519.26	13	4.06	1.50	0.46	-	-
FUG1	FUG1	VOLUME	Plantwide Fugitive Emissions	700,160	3,628,400	4	1.21	Ambient	-	-	-	-	-	64.94	1.13

Table B-2. Modeled Sources and Emissions for Criteria Pollutants

EPN	Modeled Source ID	Modeled Source Type	Modeled Source Description	Proposed Emissions PM_{10} Hourly (lb/hr)	PM_{10} Annual (tpy)	CO Hourly (lb/hr)	CO Annual (tpy)	NOx Hourly (lb/hr)	NOx Annual (tpy)	SO_2 Hourly (lb/hr)	SO_2 Annual (tpy)
25	25	POINT	Sand Application Baghouse	1.50	6.57	0.00	0.00	0.00	0.00	0.00	0.00
26A	26A	POINT	Stabilizer Storage Baghouse A	0.15	0.70	0.00	0.00	0.00	0.00	0.00	0.00
26B	26B	POINT	Stabilizer Storage Baghouse B	0.29	1.26	0.00	0.00	0.00	0.00	0.00	0.00
27	27	POINT	Stabilizer Heater Baghouse	0.09	0.40	0.00	0.00	0.00	0.00	0.00	0.00
28	28	POINT	Asphalt Heater	0.04	0.20	0.50	2.20	0.59	2.60	0.00	0.02
CFL	CFL	POINT	Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3	0.63	2.76	0.00	0.00	0.00	0.00	0.00	0.00
34	34	POINT	ESP [Backup to CFL (CECO Filters)]	0.63	2.76	0.00	0.00	0.00	0.00	0.00	0.00
8	8	POINT	Thermal Oxidizer Exhaust Stack	2.62	11.46	11.34	49.65	1.90	8.31	29.35	128.55
8A	8A	POINT	Thermal Oxidizer Exhaust thru Waste Heat Boiler	2.62	11.46	11.34	49.65	1.90	8.31	29.35	128.55
WHBLR 1	WHBLR 1	POINT	Waste Heat Recovery Boiler Natural Gas Burner	0.11	0.48	1.24	5.43	0.47	2.06	0.01	0.04
COOL3 (total 3 stks)	COOL3	POINT	Line 3 Cooling Section	6.74	29.52	0.00	0.00	0.00	0.00	0.00	0.00
1-1	1-1	POINT	Line 1 Stabilizer Storage and Heater Baghouse Stk	0.23	1.01	0.00	0.00	0.00	0.00	0.00	0.00
1-3	1-3	POINT	Line 1 Stabilizer Use Bin Baghouse Stack	0.03	0.13	0.00	0.00	0.00	0.00	0.00	0.00
1-4	1-4	POINT	Line 1 Surfacing Section Dust Collector No. 1 Stack	0.59	2.58	0.00	0.00	0.00	0.00	0.00	0.00
1-5	1-5	POINT	Line 1 Surfacing Section Dust Collector No. 2 Stack	0.59	2.58	0.00	0.00	0.00	0.00	0.00	0.00
1-6	1-6	POINT	Line 1 Surfacing Section Dust Collector No. 3 Stack	0.59	2.58	0.00	0.00	0.00	0.00	0.00	0.00
HTR1	HTR1	POINT	Heatec	0.03	0.13	0.31	1.36	0.37	1.62	0.00	0.01
BLR5	BLR5	POINT	Stand-by Boiler Vent	0.28	0.07	3.13	0.75	3.73	0.90	0.02	0.005
COOL1 (total 3 stks)	COOL1	POINT	Line 1 Cooling Section	8.52	37.30	0.00	0.00	0.00	0.00	0.00	0.00
HTR3	HTR3	POINT	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	0.01	0.02	0.04	0.18	0.05	0.22	0.01	0.01
HTR4	HTR4	POINT	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	0.01	0.02	0.04	0.18	0.05	0.22	0.01	0.01
HTR5	HTR5	POINT	Asphalt Heater for T-14 and T-15 coating Asphalt	0.01	0.03	0.08	0.36	0.10	0.43	0.01	0.01
HTR6	HTR6	POINT	Line 3 Stabilizer Thermal Fluid Heater Vent	0.05	0.20	0.49	2.16	0.60	2.58	0.01	0.02
HTR7	HTR7	POINT	Asphalt flux heater	0.03	0.15	0.38	1.68	0.46	2.00	0.003	0.01
HTR8	HTR8	POINT	Filled coating heat exchanger heater	0.03	0.15	0.38	1.68	0.46	2.00	0.003	0.01
FUG1	FUG1	VOLUME	Plantwide Fugitive Emissions	0.91	3.97	0.00	0.00	0.00	0.00	0.00	0.00

APPENDIX C: NAAQS ANALYSIS RESULTS

Table C-1. AERMOD Modeled Maximum Ground Level Concentration (GLC_{max}) with unit emission rate of 1 lb/hr

EPN	Modeled Source ID	GLC_{MAX}[1] ($\mu g/m^3$ per lb/hr) 1-hour	3-hour	8-hour	24-hour	Annual
25	25	26.04	13.09	12.01	9.66	0.80
26A	26A	40.41	21.21	10.62	6.12	0.80
26B	26B	36.90	19.13	10.13	6.66	0.81
27	27	104.43	75.75	54.72	39.27	5.97
28	28	24.65	17.49	15.10	10.86	1.69
CFL	CFL	58.23	38.73	32.86	21.86	4.10
34	34	31.39	24.01	17.13	12.51	1.52
8	8	16.01	15.35	13.26	11.13	1.33
8A	8A	22.97	18.06	15.76	10.26	1.24
WHBLR 1	WHBLR 1	68.50	37.80	27.90	17.21	2.35
COOL3	COOL3	19.44	9.63	5.86	3.69	0.53
1-1	1-1	41.43	22.11	13.38	9.52	1.45
1-3	1-3	53.91	30.54	20.50	12.50	1.70
1-4	1-4	105.57	67.76	34.53	15.96	1.99
1-5	1-5	77.76	40.39	27.09	14.13	2.49
1-6	1-6	72.71	28.30	20.33	16.47	2.79
HTR1	HTR1	74.76	41.48	28.69	19.40	3.09
BLR5	BLR5	31.36	19.48	14.76	9.36	1.21
COOL1	COOL1	17.86	8.86	5.03	3.75	0.89
HTR3	HTR3	165.74	99.07	60.73	40.09	8.33
HTR4	HTR4	171.22	98.84	63.62	42.41	7.61
HTR5	HTR5	57.21	41.33	38.67	28.47	4.29
HTR6	HTR6	29.36	17.73	15.82	8.46	1.02
HTR7	HTR7	153.91	85.23	57.64	34.00	6.32
HTR8	HTR8	136.45	73.89	56.96	33.84	6.67
FUG1	FUG1	108.37	68.62	35.38	14.00	1.80

[1] Obtained from the AERMOD modeled generic run for each EPN using the Ratio Modeling Technique.

Table C-2. Emission Rates and Maximum Ground Level Concentration (GLC_{max}) from the Ratio Modeling Significance Analysis for CO and NO_2

Carbon Monoxide (CO)

Emission Source (EPN)	Proposed Hourly CO Emissions[1] (lb/hr)	Maximum GLC_{max} per unit emission rate[3] ($\mu g/m^3$ per lb/hr)		Individual EPN Modeled GLC_{MAX}[4,5]	
		1-hour	8-hour	1-hour ($\mu g/m^3$)	8-hour ($\mu g/m^3$)
28	0.50	24.65	15.10	12.32	7.55
8	11.34	16.01	13.26	260.39	178.61
8A	11.34	22.97	15.76		
WHBLR 1	1.24	68.50	27.90	84.94	34.60
HTR1	0.31	74.76	28.69	23.18	8.89
BLR5	3.13	31.36	14.76	98.17	46.20
HTR3	0.04	165.74	60.73	6.63	2.43
HTR4	0.04	171.22	63.62	6.85	2.54
HTR5	0.08	57.21	38.67	4.58	3.09
HTR6	0.49	29.36	15.82	14.38	7.75
HTR7	0.38	153.91	57.64	58.48	21.90
HTR8	0.38	136.45	56.96	51.85	21.65
			TOTAL GLC_{max}	**621.77**	**335.22**

Nitrogen Dioxide (NO_2)

Emission Source (EPN)	Proposed Hourly NO_2 Emissions[1,2] (lb/hr)	Maximum GLC_{max} per unit emission rate[3] ($\mu g/m^3$ per lb/hr) Annual	Individual EPN Modeled GLC_{MAX}[4,5] Annual ($\mu g/m^3$)
28	0.44	1.69	0.75
8	1.42	1.33	1.90
8A	1.42	1.24	
WHBLR 1	0.35	2.35	0.83
HTR1	0.28	3.09	0.86
BLR5	2.80	1.21	3.37
HTR3	0.04	8.33	0.31
HTR4	0.04	7.61	0.29
HTR5	0.08	4.29	0.32
HTR6	0.45	1.02	0.46
HTR7	0.35	6.32	2.18
HTR8	0.35	6.67	2.30
		TOTAL GLC_{max}	**13.56**

[1] Obtained from the Table 1(a).

[2] The permit allowable emission rates for oxides of nitrogen (NOx) are multiplied by 0.75 to convert to NO_2 emission rates for air dispersion modeling purposes, per the Ambient Ratio Method, TCEQ, Air Quality Modeling Guidelines, RG-25 (Revised), February 1999, Appendix B.

[3] Obtained from the AERMOD modeled generic run for each EPN using the Ratio Modeling Technique (see Table C-1).

[4] Individual EPN Modeled GLC_{max}, (except EPN 8 /8A) = Maximum Ground Level Concentration per Unit Emission Rate ($\mu g/m^3$ per lb/hr) * Hourly Emission Rate (lb/hr)
The short-term emissions are used to predict the GLC_{max} for all the averaging periods.

Sample Concentration Calculation for 1-hour CO for EPN 28:

$$\frac{24.65 \text{ microgram/ m}^3}{\text{lb/hr}} \times \frac{0.50 \text{ lb}}{\text{hr}} = \frac{12.32 \text{ microgram}}{\text{m}^3}$$

Sample Concentration Calculation for Annual NOx for EPN 28:

$$\frac{1.69 \text{ microgram/ m}^3}{\text{lb/hr}} \times \frac{0.44 \text{ lb}}{\text{hr}} = \frac{0.75 \text{ microgram}}{\text{m}^3}$$

[5] The hot exhaust gases from the thermal oxidizer are either vented to the atmosphere from the thermal oxidizer exhaust stack (EPN 8) or are ducted to a waste heat recovery boiler (EPN 8A). Therefore, individual EPN Modeled GLC_{max} for EPNs 8/ 8A = Maximum Ground Level Concentration per Unit Emission Rate ($\mu g/m^3$ per lb/hr) between EPNs 8 and 8A* Hourly Emission Rate (lb/hr)
The short-term emissions are used to predict the GLC_{max} for all the averaging periods.

Sample Concentration Calculation for 1-hour CO for EPN 8/ 8A:

$$\frac{22.97 \text{ microgram/ m}^3}{\text{lb/hr}} \times \frac{11.34 \text{ lb}}{\text{hr}} = \frac{260.39 \text{ microgram}}{\text{m}^3}$$

Sample Concentration Calculation for Annual NOx for EPN 8/ 8A:

$$\frac{1.33 \text{ microgram/ m}^3}{\text{lb/hr}} \times \frac{1.42 \text{ lb}}{\text{hr}} = \frac{1.90 \text{ microgram}}{\text{m}^3}$$

Table C-3. MSL and State NAAQS Analysis Results for CO, NO_2, SO_2, and PM_{10}

Pollutant	Averaging Period	Emission Source Group	Emission Source Group Description	Modeling Significance Level (MSL) ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)	90% of NAAQS ($\mu g/m^3$)	Total Maximum Ground Level Concentration GLC_{MAX}[1,2] ($\mu g/m^3$)	Is Maximum Modeled Concentration less than MSL?	Background Concentration[3] ($\mu g/m^3$)	Modeled Concentration plus Background Concentration ($\mu g/m^3$)	Less than 90% of NAAQS?
CO	1-Hour	ALL	All EPNs	2,000 ✓	40,000	36,000	621.77	YES	-	-	-
	8-Hour	ALL	All EPNs	500 ✓	10,000	9,000	335.22	YES	-	-	-
NO_2	Annual	ALL	All EPNs	1 ✓	100	90	13.56	NO	30	43.56	Yes
SO_2	3-hour	Scenario 1	8A with all other EPNs	25 ✓	1,300	1,170	531.46	NO	24	555.46	Yes
		Scenario 2	8 with all other EPNs				451.76	NO		475.76	Yes
	24-hour	Scenario 1	8A with all other EPNs	5 ✓	365	329	302.05	NO	13	315.05	Yes
		Scenario 2	8 with all other EPNs				327.56	NO		340.56	No
	Annual	Scenario 1	8A with all other EPNs	1 ✓	80	72	36.45	NO	3	39.45	Yes
		Scenario 2	8 with all other EPNs				39.32	NO		42.32	Yes
PM_{10}	24-hour	Scenario 1	CFL and 8A with all other EPNs	5 ✓	150	135	67.48	NO	56	123.48	Yes
		Scenario 2	CFL and 8 with all other EPNs				67.69	NO		123.69	Yes
		Scenario 3	34 and 8A with all other EPNs				66.29	NO		122.29	Yes
		Scenario 4	34 and 8 with all other EPNs				66.95	NO		122.95	Yes
	Annual	Scenario 1	CFL and 8A with all other EPNs	1 ✓	50	45	17.91	NO	30	47.91	No
		Scenario 2	CFL and 8 with all other EPNs				17.67	NO		47.67	No
		Scenario 3	34 and 8A with all other EPNs				17.75	NO		47.75	No
		Scenario 4	34 and 8 with all other EPNs				17.51	NO		47.51	No

Table C-4. Full Impact State NAAQS analysis for SO_2 (24-hour) and PM_{10} (annual)

Pollutant	Averaging Period	Emission Source Group	Emission Source Group Description	NAAQS ($\mu g/m^3$)	Total Maximum Ground Level Concentration GLC_{MAX}[4] ($\mu g/m^3$)	Background Concentration[3] ($\mu g/m^3$)	Modeled Concentration plus Background Concentration ($\mu g/m^3$)	Less than NAAQS?
SO_2	24-hour	Scenario 1	8A with all other EPNs	365	303.41	13	316.50	Yes
		Scenario 2	8 with all other EPNs		328.91		342.00	Yes
PM_{10}	Annual	Scenario 1	CFL and 8A with all other EPNs	50	17.94	30	47.94	Yes
		Scenario 2	CFL and 8 with all other EPNs		17.70		47.70	Yes
		Scenario 3	34 and 8A with all other EPNs		17.79		47.79	Yes
		Scenario 4	34 and 8 with all other EPNs		17.54		47.54	Yes

[1] Total Maximum GLC_{max} values for CO and NO_2 are obtained using the Ratio Modeling Technique (see Table C-2).
Worst-case GLCmax value between scenario 1 (all EPNs with 8A) and scenario 2 (all EPNs with 8) is used for CO and NO_2 for calculating the GLC_{max}.

[2] Total Maximum GLC_{max} values for PM_{10} and SO_2 are obtained only for the GAF Dallas Plant sources from refined AERMOD (version 07026) run .

[3] NO_2, PM_{10}, and SO_2 background concentrations obtained from monitoring data for Dallas County using the most complete recent year (2006) that has the highest or equal to the highest values.
PM_{10} data are obtained from 3004 N. Westmoreland, (site ID: 481130057) and NO_2 and SO_2 data were obtained from 1415 Hinton Street (site ID: 481130069), Dallas County.
Monitored values for NO_2 and SO_2 were obtained in units of ppm and were converted to $\mu g/m^3$
The maximum of second highest background concentration value is used for all the averaging periods, except the annual.
The highest background concentration among all monitoring station is used for annual averaging.

[4] Total Maximum GLC_{max} values are obtained for the GAF Dallas Plant sources and TCEQ inventories sources from refined AERMOD (version 07026) run .

David Hunter #07085052
Dallas County Jail / North 6E-5 Tank
P.O. Box 660334
Dallas, TX 75266-0334

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12 FEB 2009 PM 5 T

USA 42

Texas Commission On Environmental Quality
Office Of The Chief Clerk MC-105
P.O. Box 13087
Austin, TX 78711-3087

RECEIVED
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TCEQ MAIL CENTER
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78711+3087

David Hunter
2006 McBroom Street
Dallas, Tx 75212

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FEB 13 2009
BY BP

2/11/2009
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TO: Texas Commission On Environmental Quality
Office Of The Chief Clerk Mc-105
P.O. Box 13087
Austin, TX 78711-3087

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2009 FEB 13 AM 10:19
CHIEF CLERKS OFFICE

Re: Build Materials Corporation Of America
Air Quality Permit Number #7711A

I am requesting a contested hearing. The air emission contamination may be causing health or have caused health illnesses that may be link to cancer or other uncuriable disease. My property is less then a mile from this facility where I have stayed and continue to live if possible.

Sincerely
David Hunter
2006 McBroom Street
Dallas, TX 75212

P.S.
Could you please mail a copy of your summary to me also at the following address below.

David Hunter #07085052
Dallas County Jail / North 6E-5 Tank
P.O. Box 660334
Dallas, Texas 75266-0334

AIR PA | DB03785 |
RN100788959 | 7111A | PA

NOH mailed on 7/6/10.cr

RECEIVED
OCT 11 2010
TCEQ
CENTRAL FILE ROOM

Chief Clerk's Office, MC 105
Texas Commission on
Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

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2010-0896-AIR

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

JUL 24 AM 10:27

CHIEF CLERKS OFFICE

HUNTER, DAVID # 07085052

RETURN TO SENDER
NOT IN DALLAS COUNTY JAIL

7111A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 26, 2009

David Hunter
2006 McBroom St.
Dallas, Texas 75212

Re: Build Materials Corporation of America/Air Quality Permit #7711A

Thank you for your comments regarding Build Materials Corporation of America/Air Quality Permit #7711A. Your request has been received by Texas Commission on Environmental Quality (TCEQ) staff responsible for processing such requests.

All requests for hearings, if timely filed and authorized by statute or rule, are considered by the Commissioners. The Commissioners will consider your request during a regularly scheduled Commission meeting that is open to the public, and a determination will be made as to whether or not the request will be granted. You will be notified in writing when your request is scheduled for consideration. If your request is granted, the matter will be referred to the State Office of Administrative Hearings (SOAH). The SOAH hearing will be a formal, legal proceeding, conducted in a manner similar to civil trials in state district court. While not required, parties are usually represented by legal counsel.

A copy of your comments will be forwarded by the Chief Clerk to the TCEQ staff responsible for reviewing the permit application. All timely filed comments will be considered by the staff prior to the final decision on the application. You will be added to the mailing list and receive a copy of the formal written response to all timely filed comments.

The TCEQ appreciates your interest in environmental issues. If you have any further questions, please feel free to contact any member of our staff at 1-800-687-4040.

Sincerely,

Bridget C. Bohac, Director
Office of Public Assistance

cc: LaDonna Castañuela, Chief Clerk
Mike Wilson, Permits Division
Booker Harrison, Environmental Law Division

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 26, 2009

David Hunter, #07085052
Dallas County Jail/North
6 E-5 Tank
P.O. Box 660334
Dallas, Texas 75266-0334

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The TCEQ appreciates your interest in environmental issues. If you have any further questions, please feel free to contact any member of our staff at 1-800-687-4040.

Sincerely,

Bridget C. Bohac, Director
Office of Public Assistance

cc: LaDonna Castañuela, Chief Clerk
Mike Wilson, Permits Division
Booker Harrison, Environmental Law Division

Brown McCarroll L.L.P.

111 Congress Avenue, Suite 1400, Austin, Texas 78701-4043
512-472-5456 fax 512-479-1101

direct (512) 479-1125 rjohnson@mailbmc.com

June 2, 2010

LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
P. O. Box 13087, MC 105
Austin, Texas 78711-3087

Via Hand Delivery & U.S. Mail

Re: Request for Direct Referral
Building Materials Corporation of America
Air Quality Permit Amendment Application for Permit No. 7711A

Dear Ms. Castañuela:

Pursuant to 30 TAC § 55.210, Building Materials Corporation of America ("BMCA") requests TCEQ refer the above-referenced application directly to the State Office of Administrative Hearings for a hearing on the application.

The application was filed on December 18, 2008 and the amendment is required pursuant to Agreed Order Docket No. 2008-0805-AIR-E. BMCA is operating under its second extension of the Order deadline. Therefore, to expedite the process, BMCA requests that a hearing date be set for no later than 30 days from the date of this request.

If you have any questions, please contact me at (512) 479-1125.

Sincerely,

Rod Johnson

cc: Erin Selvera, Legal Division, TCEQ
Javier Galván, Air Permits Division, TCEQ

4439526.1
13577.91231

Brown McCarroll L.L.P.

111 Congress Avenue, Suite 1400, Austin, Texas 78701-4043
512-472-5456 fax 512-479-1101

direct (512) 479-1125 rjohnson@mailbmc.com

June 2, 2010

LaDonna Castañuela, Chief Clerk
Texas Commission on Environmental Quality
P. O. Box 13087, MC 105
Austin, Texas 78711-3087

Via Hand Delivery & U.S. Mail

Re: Request for Direct Referral
Building Materials Corporation of America
Air Quality Permit Amendment Application for Permit No. 7711A

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The application was filed on December 18, 2008 and the amendment is required pursuant to Agreed Order Docket No. 2008-0805-AIR-E. BMCA is operating under its second extension of the Order deadline. Therefore, to expedite the process, BMCA requests that a hearing date be set for no later than 30 days from the date of this request.

If you have any questions, please contact me at (512) 479-1125.

Sincerely,

Rod Johnson

cc: Erin Selvera, Legal Division, TCEQ
Javier Galván, Air Permits Division, TCEQ

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2010 JUN -2 PM 1:20
CHIEF CLERKS OFFICE

4439526.1
13577.91231

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form for Air Permitting

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

All applicants must complete all applicable portions of this form. The completed form should be sent to the TCEQ to the attention of the Office of the Chief Clerk. For more information regarding public notice, refer to the instructions in the public notice package.

ALTERNATIVE LANGUAGE CHECKLIST		
I have contacted the appropriate school district.		☒ YES ☐ NO
A bilingual education program is required by the Texas Education Code in the district.		☒ YES ☐ NO
School District: **Dallas Independent School District**	Phone No.: **972-794-4300**	
Person Contacted: **Ms. Genevieve Reyes**	Date: **03/10/2009**	
The name of the elementary school nearest to the proposed or existing facility is: **C F Carr Elementary School**		
The name of the middle school nearest to the proposed or existing facility is: **Raul Quintanilla Sr Middle School**		
The following language(s) is/are utilized in the bilingual program:	**Spanish**	
If an applicable bilingual program exists, then applicants must publish a notice and/or post signs, as outlined in the *Instructions for Public Notice* and certify as applicable on this form.		
ALTERNATIVE LANGUAGE VERIFICATION		
I verify that the area addressed by this permit application is subject to alternative language public notice requirements.		☒ YES ☐ NO
I verify that the applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).		☒ YES ☐ NO
I verify that no such newspaper or publication was found in any of the alternative language(s) in which notice is required.		☐ YES ☒ NO
I verify that the publisher of the newspapers listed below refuse to publish the notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located (or proposed to be located).		☐ YES ☐ NO ☒ N/A
Newspaper:	Language:	
I verify that bilingual sign(s) required by the TCEQ were posted. *(if applicable)*		☒ YES ☐ NO **(for 1st Notice)**
I verify that original tear sheets of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.		☒ YES ☐ NO
Signed by: **Mr. Doug Harris**	Applicant: **Building Materials Corporation of America**	
Title: **Engineering Manager**	Date: April 21, 2010	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form for Air Permitting

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

NEW SOURCE REVIEW PERMIT NOTICE VERIFICATION	
I verify that the required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ.	☒ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ.	☒ YES ☐ NO
Notice of Receipt of Application and Intent to Obtain Permit (1st Notice): I verify that a copy of the complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☒ YES ☐ NO
Notice of Application and Preliminary Decision (2nd Notice, if applicable): I verify that a copy of the complete air quality application and draft permit, and any revisions, are available for review and copying at the public place indicated below from the first day after newspaper publication; and	
I also verify that the air quality application and draft permit, and any revisions, will remain in the designated public place until either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing.	☒ YES ☐ NO
Name of Public Place:	**Dallas West Library**
Address of Public Place:	**2332 Singleton Boulevard, Dallas, Texas**
Signed by: **Mr. Doug Harris**	
Title: **Engineering Manager**	**Date: April 21, 2010**

FEDERAL OPERATING PERMIT (TITLE V) NOTICE VERIFICATION	
I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ.	☐ YES ☐ NO
I verify that a copy of the complete air quality application and draft permit, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☐ YES ☐ NO
Name of Public Place:	
Address of Public Place:	
Signed by:	
Title:	Date:

GAF ELK MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212 Tel: 214-637-1060

April 21, 2010

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Re: Public Notice Requirements
Permit Amendment Application
TCEQ Permit No.7711A
Asphalt Roofing Production Facility
Building Materials Corporation of America. – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the TCEQ, dated December 18, 2008. This permit amendment application was declared administratively complete on January 14, 2009. As a part of the air permitting process, the Dallas Plant published a formal public notice for the Notice of Receipt of Application and Intent to Obtain Permit (1st Notice) on February 5, 2009. The TCEQ issued a preliminary decision and the draft permit on February 8, 2010. The Dallas Plant is required to publish a formal public notice for the Notice of Application and Preliminary Decision (2nd Notice) in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ dated February 8, 2010, the Dallas Plant has completed the following for the 2nd Public Notice:

- Published a formal public notice on March 11, 2010 in the following newspapers circulated in Dallas, Dallas County:
  - The Dallas Observer (English)
  - El Extra (Spanish)
- Placed a copy of the permit amendment application and the Executive Director's preliminary decision (including the draft permit) at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning March 11, 2010

GAF
GAF MATERIAL PORATION
2600 Singleton Blvd Dallas TX
GAF MATERIALS CORPORATION
75212

CERTIFIED MA
91 7108 2133 3934 7775 9117

DOC 75260
MAY 2010 PM

$3.41
$2.75

First Class Mail

RECEIVED
MAY 06 2010
TCEQ MAIL CENTER
MM

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
10 MAY -6 PM 2:13
CHIEF CLERKS OFFICE

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, TX 78711-3087

The Dallas Plant is required to submit original newspaper clippings showing the publication date and newspaper name to the TCEQ within 10 business days after the date of publication. The Dallas Plant is also required to submit an original affidavit of publication and alternative language affidavit of publication within 30 calendar days after the date of publication. The Dallas Plant submitted the following on March 17, 2010:

- Original newspaper clippings showing publication date and newspaper name in English and Spanish languages
- Original Affidavit of Publication in English
- Original Alternative Language Affidavit of Publication

Within 10 business days after end of the designated comment period, the Dallas Plant is required to submit the Public Notice Verification Form to the TCEQ. As such, the Dallas Plant is submitting the Public Notice Verification Form and photocopies of these submittals are being mailed to the following, as listed on the *Notification List*:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
Mr. Javier Galván, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Air Section Manager
Dallas/Fort Worth Regional Office
2309 Gravel Dr
Fort Worth, Texas 76118-6951

Section Manager
Air Pollution Control Program
City of Dallas Environmental and Health Services
320 E. Jefferson Blvd, Room LL13
Dallas, Texas 75203-2632

If you have any questions, please call me at (214) 637-8909.

Sincerely,

Doug Harris
Engineering Manager

cc: U.S. EPA Region 6, Air Permits (6PD-R)
Mr. Javier Galván, P.E., TCEQ Office of Permitting and Registration
Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas, Air Pollution Control Program
Mr. Fred Bright, GAF
Mr. David Fuelleman, GAF

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Ma[illegible]als Corporation of America

Permit No.: 7711A
Notice of Application and Preliminary Decision

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF Dallas §

2010 MAR 23 PM 2:33
CHIEF CLERKS OFFICE
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Before me, the undersigned authority, on this day personally appeared Marie Farley (*name of newspaper representative*), who being by me duly sworn, deposes and says that (s)he is the Sr. Account Executive (*title of newspaper representative*) of the Dallas Observer (*name of newspaper*); that said newspaper is generally circulated in Dallas (*in the municipality or nearest municipality to the location of the facility or the proposed facility*), Texas; that the attached notice was published in said newspaper on the following date(s):

3/11/10

Marie Farley
(*newspaper representative's signature*)

Subscribed and sworn to before me this the 15 day of March, 2011, to certify which witness my hand and seal of office.

Bailey Dhane
Notary Public in and for the State of Texas

(Seal)

BAILEY MICHELLE [illegible]
Notary Public, State of Texas
My Commission Exp[illegible]
November 27, 20[illegible]

Bailey Dhane
Print or Type Name of Notary Public

11/27/2011
My Commission Expires

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 7711A

APPLICATION AND PRELIMINARY DECISION. Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. This application was submitted to the TCEQ on December 19, 2008. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

You may submit additional written public comment to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, or electronically at www.tceq.state.tx.us/about/comments.html within 30 days of the date of newspaper publication of this notice.

OPPORTUNITY FOR A CONTESTED CASE HEARING. After the deadline for public comment, the executive director will consider the comments and prepare a response to all relevant and material or significant public comment. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application. The mailing will also provide instructions for requesting a contested case hearing or reconsideration of the executive director's decision.**

A contested case hearing is a legal proceeding similar to a civil trial in a state district court. **A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility.**

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to

the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period and have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

EXECUTIVE DIRECTOR ACTION. A timely hearing request has been received by the TCEQ. However, if all timely contested case hearing requests have been withdrawn and no additional comments are received, the executive director may issue final approval of the application. If all timely hearing requests are not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

INFORMATION. If you need more information about this permit application or the permitting process, please call the Office of Public Assistance, toll free, at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040. General information about the TCEQ can be found at our Web site at www.tceq.state.tx.us.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at (214) 637-8909.

Notice Issuance Date: February 8, 2010

TO ALL INTERESTED PERSONS AND PARTIES:

Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production Facility at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. Additional information concerning this application is contained in the public notice section of this newspaper.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America

Permit No.: 7711A
Notice of Application and Preliminary Decision

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF DALLAS §

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2010 MAR 23 PM 2:34
CHIEF CLERKS OFFICE

Before me, the undersigned authority, on this day personally appeared

EMMY SILVA, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the PUBLISHER
(title of newspaper or publication representative)

of the EL EXTRA SPANISH LANGUAGE NEWSPAPER; that said newspaper or publication is generally circulated
(name of newspaper or publication)

in DALLAS, DALLAS, COUNTY, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

MARCH 11, 2010

Emmy Silva
(newspaper or publication representative's signature)

Subscribed and sworn to before me this the 11 day of MARCH, 2010,

to certify which witness my hand and seal of office.

Agustin Pastrana
Notary Public in and for the State of Texas

(Seal)

Agustin Pastrana
Notary Public, State of Texas
My Commission Expires:
November 5, 2010

Agustin Pastrana
Print or Type Name of Notary Public

11-5-2010
My Commission Expires

AVISO DE SOLICITUD Y DECISION PRELIMINAR PARA UN PERMISO DE CALIDAD DE AIRE

PERMISO DE CALIDAD DE AIRE NO. *7711A*

SOLICITUD Y DECISION PRELIMINAR. Building Materials Corporation of America, se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A, el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3738. La instalación existente va a emitir los siguientes contaminantes atmosféricos: particulas de materia incluyendo partículas de materia menores de 10 micras en diámetro, particulas de materia menores de 2.5 microness en diámetro, dióxido de azufre, compuestos organicos, monóxido de carbono y óxido de nitrógeno.

El director ejecutivo de la TCEQ ha concluido la revisión técnica de la solicitud y ha preparado un permiso preliminar, el cual si es aprobado, establecera las condiciones debajo de las cuales el sitio debera operar. El director ejecutivo a hecho la decisión preliminar de otorgar este permiso. La solicitud del permiso, la decisión preliminar del director ejecutivo, y el permiso preliminar estarán disponibles para ser revisados y copiados en la Oficina Central de la TCEQ, en la oficina regional de *TCEQ* en Fort Worth, y en la Dallas West Library, 2332 Singleton Boulevard, Dallas, Condado de Dallas, Texas. Los archivos del cumplimiento de la leyes de la facilidad, si existen, están disponibles para la revisión del público en la Oficina Regional de Fort Worth de la TCEQ.

COMENTARIOS PUBLICOS/JUNTA PUBLICA Usted puede presentar comentarios públicos o solicitar una junta pública sobre esta solicitud. El propósito de la junta pública es el proveer la oportunidad de someter comentarios o hacer preguntas sobre esta solicitud. La TCEQ tendra una junta pública si el director ejecutivo determina que hay suficiente interes de parte del público en esta solicitud o si es solicitada por un legislador local. Una junta pública no es una audencia en controversia.

Comentarios por escrito o peticiones para juntas públicas sobre esta solicitud deberán recibirse por escrito en la Oficina del Secretario Principal (Office of the Chief Clerk), MC105, TCEQ, P.O. Box 13087, Austin, Texas 78711-3087, o por el Internet al www.tceq.state.tx.us/about/comments.html, **dentro de 30 días después de la publicación de este aviso.**

Después del plazo final para someter comentarios públicos subsequentes a cualquier Aviso de la Solicitud y de la Decisión Preliminar que se requiera, el director ejecutivo considerará los comentarios y preparará una respuesta a todos los comentarios públicos relevantes y materiales, o de otro modo significativos. **La respuesta a los comentarios,junto con la decisión del director ejecutivo sobre la solicitud, serán entonces enviada por correo a todos aquellos que hallan sometido comentarios públicos o que hallan peticionado para estar en la lista de correo sobre esta solicitud. Si alguna solicitud para audencia pública no es retirada, la correspondencia tendra instrucciones sobre como solicitar una audencia en controversia o como solicitar que la decisión del director ejecutivo sea reconsiderada.**

OPORTUNIDAD PARA UNA AUDIENCIA EN CONTROVERSIA Una audiencia en controversia es un proceso legal semejante a un a un juicio civil en una corte de distrito estatal. **Una persona que pueda ser afectada por las emisiones de contaminantes atmosféricos de la instalación tiene derecho a peticionar una audiencia en controversia. Para solicitar una audiencia en controversia, usted deberá proporcionar lo siguiente: (1) su nombre (o, para un grupo o asociación, un representante oficial), dirección postal, número de teléfono durante el día, y número de fax, si hay; (2) el nombre del solicitante y el número de permiso; (3) la oración en inglés "I/we request a contested case hearing;" (4) una descripción específica de cómo le perjudicaría la solicitud y las emisiones atmosféricas de una manera que no es común con los miembros del público en general; (5) la localización y distancia de su propiedad en relación a la instalación; y (6) una descripción de cómo usted usa la propiedad que pudiera ser afectada por la instalación.**

Una audiencia en controversia sólo se otorgará basada en asuntos en controversia que sean relevantes y materiales a la decisión de los Comisionados sobre la solicitud. Además, la Comisión sólo concederá una audiencia en controversia en esos asuntos que fueron presentados durante el período de los comentarios públicos y que no se retiraron. Asuntos como el valor de la propiedad, ruido, seguridad de tráfico, y zonas municipales están fuera de lo que la Comisión tiene la juridicción de considerar en este proceso.

ACCION DEL DIRECTOR EJECUTIVO Una solicitud para audencia a sido recibida por la TCEQ dentro del plazo de tiempo requerido. A menos de que se presente una petición para una audencia en controversia o una petición para que reconsidere su decisión, el director ejecutivo aprobara la solicitud para este permiso. Si se reciben peticiones para una audiencia en controversia o para que se reconsidere su desicion, el director ejecutivo no aprovara la solicitud para este permiso y remitirá la solicitud y las peticiones a los Comisionados de la TCEQ para su consideracion en una junta Comisionados.

LISTA PARA ENVIO DE CORREO Usted puede solicitar ser incluido en una lista de correo para recibir información adicional con respecto a esta solicitud. Para ser incluido en una lista de correo, envíe su petición a la oficina del Office of Chief Clerk a la dirección que se encuentra a continuación en el párrafo titulado «Información.»

INFORMACION Para mas información sobre la solicitud para este permiso o sobre el proceso de permisos, llame a la Oficina de Asistencia Pública (Office of Public Assistance), sin cargo a el 18006874040. Información general concerniente a la TCEQ puede encontrarse vía internet en http://www.tceq.state.tx.us/.

Mas información puede ser obtenida de Building Materials Corporation of America en la dirección en el primer parráfo o llamando a Mr. Doug Harris, Plant Engineer, al (214) 637-8909.

Fecha de Expedición: February 8, 2010

Marzo 11, 2010

EL EXTRA

Marzo 11, 2010 EL EXTRA

A TODAS LAS PERSONAS Y PARTES INTERESADAS:

Building Materials Corporation of America se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A el cual autorizará la modificacción de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Texas 75212-3738. Información adicional sobre esta solicitud puede encontrarse en la sección de avisos públicos de esta publicación.

GAF ELK MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212 Tel: 214-637-1060

March 17, 2010

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Re: 2nd Public Notice Requirements
Permit Amendment Application
TCEQ Permit No.7711A
Asphalt Roofing Production Facility
Building Materials Corporation of America. – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the TCEQ, dated December 18, 2008. This permit amendment application was declared administratively complete on January 14, 2009. As a part of the air permitting process, the Dallas Plant published a formal public notice for the Notice of Receipt of Application and Intent to Obtain Permit (1st Notice) on February 5, 2009. The TCEQ issued a preliminary decision and the draft permit on February 8, 2010. As such, the Dallas Plant is required to publish a formal public notice for the Notice of Application and Preliminary Decision (2nd Notice) in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ on February 8, 2010, the Dallas Plant has completed the following:

- Published a formal 2nd public notice on March 11, 2010 in the following newspapers circulated in Dallas, Dallas County:
  - The Dallas Observer (English)
  - El Extra (Spanish)
- Placed a copy of the permit amendment application and the Executive Director's preliminary decision (including the draft permit) at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning March 11, 2010

The Dallas Plant is required to submit original newspaper clippings showing the publication date and newspaper name to the TCEQ within 10 business days after the date of publication. The Dallas Plant is also required to submit an original affidavit of publication and alternative language affidavit of publication within 30 calendar days after the date of publication. As such, the Dallas Plant is submitting the following:

- Original newspaper clippings showing publication date and newspaper name in English and Spanish languages

- Original Affidavit of Publication in English
- Original Alternative Language Affidavit of Publication

Photocopies of these submittals are being mailed to the following, as listed on the *Notification List*:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
Mr. Javier Galván, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Dallas/Fort Worth Regional Office
2309 Gravel Dr
Fort Worth, Texas 76118-6951

Section Manager
Air Pollution Control Program
City of Dallas Environmental and Health Services
320 E. Jefferson Blvd, Room LL13
Dallas, Texas 75203-2632

If you have any questions, please call me at (214) 637-8909.

Sincerely,

Doug Harris
Engineering Manager

cc: U.S. EPA Region 6, Air Permits (6PD-R)
Mr. Javier Galván, TCEQ Office of Permitting and Registration
Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas, Air Pollution Control Program
Mr. Fred Bright, GAF
Mr. David Fuelleman, GAF

From: Origin ID: TRLA (972) 661-8100
Karissa Kell
Trinity Consultants
12770 Merit Drive
Suite 900
Dallas, TX 75251

FedEx Express

J1010100222202224

Ship Date: 18MAR10
ActWgt: 1.0 LB
CAD: 2398611/INET3010

Delivery Address Bar Code

SHIP TO: (512) 239-3300 BILL SENDER
Chief Clerk's Office, MC 105
TCEQ - Attn: Notice Team
12100 PARK THIRTY FIVE CIR
STE 1101, Building F
AUSTIN, TX 78753

Ref # 104401.0035.0004
Invoice #
PO #
Dept #

RECEIVED
MAR 23 2010
CHIEF CLERKS OFFICE
2010 MAR 23 PM 2:33
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

TRK# 0201 7984 8789 9487

TUE - 23 MAR A1
EXPRESS SAVER

78753
TX-US
AUS

SB MMRA

505G1/F853/5FE8

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic valueof the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is $500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

WES BURNETT PUBLISHER
ROCKWALL COUNTY NEWS
PO BOX 819
ROCKWALL TX 75087-0819

TERRI WHITE SMITH
505 RIGGS CIR
MESQUITE TX 75149-5844

RAY A CAMPBELL JR
BIOTOX INC
9130 WURZBACH RD
SAN ANTONIO TX 78240-1070

KYTINNA SOTO OWNER
SOTO GROUP
PO BOX 267
STEPHENVILLE TX 76401-0004

R W CARTER
RICHARD W CARTER ASSOCIATES
PO BOX 903
MINEOLA TX 75773-0903

PAUL D TAYLOR PASTOR
PLEASANT VALLEY BAPTIST CHURCH
PO BOX 850062
MESQUITE TX 75185-0062

GLENN G DRAPER PE
DRAPER ENGINEERING
2816 HANOVER ST
DALLAS TX 75225-7924

CHERYL TEAMES
RJN GROUP INC
STE 400
12160 ABRAMS RD
DALLAS TX 75243-4547

MARIE EARLEY CITY ATTY
DALLAS OBSERVER
STE 700
2501 OAK LAWN AVE
DALLAS TX 75219-4019

IRVIN A UPHOFF
2532 ALDEN AVE
DALLAS TX 75211-2713

BUCHANAN EASLEY
4020 SUMMIT CT
FAIRVIEW TX 75069-1183

JERRY VALDEZ
PO BOX 12031
AUSTIN TX 78711-2031

DAVID HUNTER
2006 MCBROOM ST
DALLAS TX 75212-2450

MS SARAH K WALLS
CANTEY HANGER LLP
CANTEY HANGER PLAZA - STE 300
600 W 6TH ST
FORT WORTH TX 76102-3684

CLIFF MARTIN
EAST FORK SUD
4040 AVION DR
WYLIE TX 75098-6200

BRIAN G WILLIAMS WASTEWATER DIRECTOR
ROWLETT CREEK WATER REC.
2500 E CENTERVILLE RD
GARLAND TX 75040-6811

BOBBY PRAYTOR
DALLAS WATER UTILITIES
1500 MARILLA ST STE 4AS
DALLAS TX 75201-6318

NORMAN D RADFORD
PO BOX 7650
DALLAS TX 75209-0650

Prot. IP. Dallas County 2/9/10

CANADIAN RIVER MUNICIPAL WATER AUTHORITY
PO BOX 9
SANFORD TX 79078-0009

DALLAS COUNTY HEALTH & HUMAN SERVICES
2377 N STEMMONS FWY
DALLAS TX 75207-2710

DALLAS COUNTY JUDGE
COUNTY COURTHOUSE
411 ELM ST
DALLAS TX 75202-3301

SECRETARY
GREATER DALLAS CHAMBER OF COMMERCE
700 N PEARL ST STE 1200
DALLAS TX 75201-7405

NORTH CENTRAL TEXAS COUNCIL OF GOVT
DEPT OF ENVIRONMENTAL
PO BOX 5888
ARLINGTON TX 76005-5888

NORTH TEXAS MUNICIPAL WATER DISTRICT
PO BOX 2408
WYLIE TX 75098-2408

PUBLIC HEALTH REGION 2/3
TEXAS DEPARTMENT OF STATE HEALTH SERVICES
1301 S BOWEN RD STE 200
ARLINGTON TX 76013-2262

US ARMY CORPS OF ENGINEERS
REGULATORY BRANCH
CESWS-PER-R
PO BOX 17300
FORT WORTH TX 76102-0300

FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
711 STADIUM DR STE 252
ARLINGTON TX 76011-6247

TERRY HODGINS WATERSHED MGR
DALLAS WATER UTILITIES
405 LONG CREEK RD
SUNNYVALE TX 75182-9275

JAMES M OLIVER GENERAL MANAGER
TARRANT REGIONAL WATER DISTRICT
PO BOX 4508
FORT WORTH TX 76164-0508

HOWARD S SLOBODIN STAFF ATTORNEY
TRINITY RIVER AUTHORITY OF TEXAS
PO BOX 60
ARLINGTON TX 76004-0060

ZACHARY S THOMPSON
DALLAS CO HEALTH & HUMAN SERVICES
OFFICIAL
2377 N STEMMONS FWY
DALLAS TX 75207-2710

County Officials

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 8, 2010

MR DAVID FUELLERMAN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Application
Permit Number: 7711A
Asphalt Roofing Production Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN602717464

Dear Mr. Fuellerman:

The executive director has completed the technical review of your application and has prepared a preliminary decision and draft permit.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Public Notice Checklist
- Instructions for Public Notice
- Public Notice Verification Form (Form TCEQ-20244)
- Affidavit of Publication for Air Permitting (Form TCEQ-20533) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20534)
- Notification List
- Draft Permit
- Executive Director's Preliminary Decision

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

Re: Permit Number 7711A

If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Mr. Javier Galván, P.E., at (512) 239-1319.

Sincerely,

LaDonna Castañuela
Office of the Chief Clerk
Texas Commission on Environmental Quality

LDC/JVG/ssl

Enclosures

cc: Latha Kambham, Ph.D., Consultant, Trinity Consultants, Dallas
Ms. Christine M. Otto Chambers, Managing Consultant, Trinity Consultants, Dallas
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 143272

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

EXAMPLE A

NOTICE OF APPLICATION AND PRELIMINARY DECISION FOR AN AIR QUALITY PERMIT

PROPOSED PERMIT NUMBER: 7711A

APPLICATION AND PRELIMINARY DECISION. Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. This application was submitted to the TCEQ on December 19, 2008. The facility will emit the following air contaminants: particulate matter including particulate matter less than 10 microns in diameter and particulate matter less than 2.5 microns in diameter, sulfur dioxide, volatile organic compounds, carbon monoxide, and nitrogen oxides.

The executive director has completed the technical review of the application and prepared a draft permit which, if approved, would establish the conditions under which the facility must operate. The executive director has made a preliminary decision to issue the permit because it meets all rules and regulations. The permit application, executive director's preliminary decision, and draft permit will be available for viewing and copying at the TCEQ Central Office, the TCEQ Fort Worth Regional Office, and at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review at the Texas Commission on Environmental Quality Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

MAILING LIST. You may ask to be placed on a mailing list to obtain additional information on this application by sending a request to the Office of the Chief Clerk at the address below.

PUBLIC COMMENT/PUBLIC MEETING. You may submit public comments or request a public meeting about this application. The purpose of a public meeting is to provide the opportunity to submit comment or to ask questions about the application. The TCEQ will hold a public meeting if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

You may submit additional written public comment to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, or electronically at www.tceq.state.tx.us/about/comments.html within 30 days of the date of newspaper publication of this notice.

OPPORTUNITY FOR A CONTESTED CASE HEARING. After the deadline for public comment, the executive director will consider the comments and prepare a response to all relevant and material or significant public comment. **The response to comments, along with the executive director's decision on the application will be mailed to everyone who submitted public comments or is on a mailing list for this application. The mailing will also provide instructions for requesting a contested case hearing or reconsideration of the executive director's decision.**

A contested case hearing is a legal proceeding similar to a civil trial in a state district court. A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. A contested case hearing request must include the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "I/we request a contested case hearing;" (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility.

A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period and have not been withdrawn. Issues that are not raised in public comments may not be considered during a hearing.

EXECUTIVE DIRECTOR ACTION. A timely hearing request has been received by the TCEQ. However, if all timely contested case hearing requests have been withdrawn and no additional comments are received, the executive director may issue final approval of the application. If all timely hearing requests are not withdrawn, the executive director will not issue final approval of the permit and will forward the application and requests to the Commissioners for their consideration at a scheduled commission meeting.

INFORMATION. If you need more information about this permit application or the permitting process, please call the Office of Public Assistance, toll free, at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040. General information about the TCEQ can be found at our Web site at www.tceq.state.tx.us.

Further information may also be obtained from Building Materials Corporation of America at the address stated above or by calling Mr. Doug Harris, Plant Engineer, at (214) 637-8909.

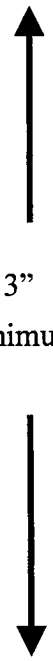
Notice Issuance Date: February 8, 2010

EXAMPLE B

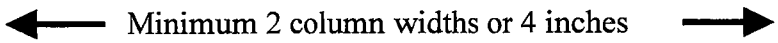
Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

Building Materials Corporation of America has applied to the Texas Commission on Environmental Quality for an amendment to Air Quality Permit Number 7711A, which would authorize modification to an Asphalt Roofing Production Facility at 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738. Additional information concerning this application is contained in the public notice section of this newspaper.



3" minimum



Minimum 2 column widths or 4 inches

PUBLIC NOTICE CHECKLIST

Notice of Application and Preliminary Decision for an Air Quality Permit
(2nd Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 33 calendar days after date of this letter
Publish *Notice of Application and Preliminary Decision for an Air Quality Permit* in the same newspaper(s) in which you published *Notice of Receipt of Intent to Obtain Permit* for this application. - Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing. - Example B (if applicable) must be published in prominent location (other than "public notice") in same issue of newspaper Provide copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) at a public place for review and copying. Keep them there for duration of the designated comment period.
First day of newspaper publication
Review published newspaper notice for accuracy. If errors, contact Air Permits Division. Ensure copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit) are at the public place.
Within 10 business days after date of publication
Mail original newspaper clippings showing publication date and newspaper name to: Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*.
Within 30 calendar days after date of publication
Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to: Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of affidavits to persons listed on *Notification List*.
Within 10 business days after end of the designated comment period
Mail Public Notice Verification Form to: Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of Public Notice Verification Form to persons listed on *Notification List*.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

INSTRUCTIONS FOR PUBLIC NOTICE
For New Source Review Air Permit

NOTICE OF APPLICATION AND PRELIMINARY DECISION

We have completed the technical review of your application and issued a preliminary decision. You must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* within **33 calendar days** after the date this information was mailed to you (see date of letter).

- You must publish the enclosed *Notice of Application and Preliminary Decision for an Air Quality Permit* at your expense, in the same newspaper(s) in which you published the *Notice of Receipt and Intent to Obtain Permit* for this application. The newspaper must be a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper must be of general circulation in the municipality nearest the location.

- You must publish this notice in one issue of any applicable newspaper.

- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- Example B must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths.** If the newspaper chosen does not use standard advertising units for measurement, the notice must be at least **12 square inches** with the shortest side of at least **3 inches**.

- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (newspaper notice).

- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.

- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. The same newspaper(s) used for *Notice of Receipt and Intent to Obtain Permit* must be used for publication of the *Notice of Application and Preliminary Decision for an Air Quality Permit.* This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.

- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published more than once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.

- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.

- The applicant has the burden to demonstrate compliance with these requirements. To assist applicants in meeting these requirements, the TCEQ has provided the *Public Notice Verification Form* (enclosed). You must fill out the *Public Notice Verification Form* indicating your compliance with the requirements regarding publication in an alternative language. This form is also available at www.tceq.state.tx.us/goto/air/publicnotice.

- It is suggested the applicant work with the local school district to do the following:

  (a) determine if a bilingual program is required in the district;
  (b) determine which language is required by the bilingual program;
  (c) locate the nearest elementary and middle schools; and
  (d) determine if any students attending either school are entitled to be enrolled in a bilingual educational program.

- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.state.tx.us/goto/air/publicnotice.

- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period should last at least **30 calendar days**. With the exception of renewals and concrete batch plants whose comment period should last at least **15 calendar days**.

- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.

- The comment period for the permit may lengthen depending on whether a public meeting is held or if second notice is required. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.

- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the TCEQ Office of the Chief Clerk within **10 business days** after the date of publication.

- You must submit an **original affidavit of publication for air permitting and alternate language affidavit of publication for air permitting (if applicable)** to the Office of the Chief Clerk within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.

- You must submit the *Public Notice Verification Form* to the Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements.

- The **original affidavits of publication, *Public Notice Verification Form*, and original newspaper clippings of the published notices** must be mailed to:

  Texas Commission on Environmental Quality
  Office of the Chief Clerk, MC-105
  Attn: Notice Team
  P.O. Box 13087
  Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.

- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication *on time*,** the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Applications for air quality permits are not required to post signs during the *Notice of Application and Preliminary Decision.*

Application in a Public Place

- You must provide a copy of the complete application (including any subsequent revisions) and the executive director's preliminary decision (including the draft permit), at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls.)

- This copy must be accessible to the public for review and copying. The copy must be available beginning on the first day of newspaper publication and remain in place until the commission has taken action on the application or the commission refers issues to the State Office of Administrative Hearings.

- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."

- You must submit verification of file availability using the *Public Notice Verification Form* within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period.

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Preliminary Decision.*

If you have questions or need assistance regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300 or the project reviewer listed in the cover letter.

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America

Permit No.: 7711A
Notice of Application and Preliminary Decision

AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the _____
(title of newspaper representative)

of the _____; that said newspaper is generally circulated
(name of newspaper)

in _____, Texas;
(in the municipality or nearest municipality to the location of the facility or the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

_____.

_____
(newspaper representative's signature)

Subscribed and sworn to before me this the _____ day of _____,20_____,

to certify which witness my hand and seal of office.

_____
Notary Public in and for the State of Texas

(Seal)

_____
Print or Type Name of Notary Public

_____
My Commission Expires

TCEQ-Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America

Permit No.: 7711A
Notice of Application and Preliminary Decision

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS §

COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the _____
(title of newspaper or publication representative)

of the _____; that said newspaper or publication is generally circulated
(name of newspaper or publication)

in _____, Texas;
(in the municipality or the same county as the location of the facility or the proposed facility)

that the attached notice was published in said newspaper or publication on the following date(s):

_____.

_____
(newspaper or publication representative's signature)

Subscribed and sworn to before me this the _____ day of _____, 20_____,

to certify which witness my hand and seal of office.

_____
Notary Public in and for the State of Texas

(Seal)

_____
Print or Type Name of Notary Public

_____
My Commission Expires

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form
for Air Permitting

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

All applicants must complete all applicable portions of this form. The completed form should be sent to the TCEQ to the attention of the Office of the Chief Clerk. For more information regarding public notice, refer to the instructions in the public notice package.

ALTERNATIVE LANGUAGE CHECKLIST		
I have contacted the appropriate school district.		☐ YES ☐ NO
A bilingual education program is required by the Texas Education Code in the district.		☐ YES ☐ NO
School District:	Phone No.:	
Person Contacted:	Date:	
The name of the elementary school nearest to the proposed or existing facility is:		
The name of the middle school nearest to the proposed or existing facility is:		
The following language(s) is/are utilized in the bilingual program:		
If an applicable bilingual program exists, then applicants must publish a notice and/or post signs, as outlined in the *Instructions for Public Notice* and certify as applicable on this form.		
ALTERNATIVE LANGUAGE VERIFICATION		
I verify that the area addressed by this permit application is subject to alternative language public notice requirements.		☐ YES ☐ NO
I verify that the applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).		☐ YES ☐ NO
I verify that no such newspaper or publication was found in any of the alternative language(s) in which notice is required.		☐ YES ☐ NO
I verify that the publisher of the newspapers listed below refuse to publish the notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located (or proposed to be located).		☐ YES ☐ NO ☐ N/A
Newspaper:	Language:	
I verify that bilingual sign(s) required by the TCEQ were posted. *(if applicable)*		☐ YES ☐ NO
I verify that original tear sheets of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.		☐ YES ☐ NO
Signed by:	Applicant:	
Title:	Date:	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form
for Air Permitting

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

NEW SOURCE REVIEW PERMIT NOTICE VERIFICATION	
I verify that the required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
Notice of Receipt of Application and Intent to Obtain Permit (1st Notice): I verify that a copy of the complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☐ YES ☐ NO
Notice of Application and Preliminary Decision (2nd Notice, if applicable): I verify that a copy of the complete air quality application and draft permit, and any revisions, are available for review and copying at the public place indicated below from the first day after newspaper publication; and	
I also verify that the air quality application and draft permit, and any revisions, will remain in the designated public place until either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing.	☐ YES ☐ NO
Name of Public Place:	
Address of Public Place:	
Signed by:	
Title:	Date:

FEDERAL OPERATING PERMIT (TITLE V) NOTICE VERIFICATION	
I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ.	☐ YES ☐ NO
I verify that a copy of the complete air quality application and draft permit, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☐ YES ☐ NO
Name of Public Place:	
Address of Public Place:	
Signed by:	
Title:	Date:

NOTIFICATION LIST

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavit of Publication for Air Permitting*, the *Alternative Language Affidavit of Publication for Air Permitting (if applicable)*, and a completed copy of the *Public Notice Verification Form*. Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
Mr. Javier Galván, P.E.
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Dallas/Fort Worth Regional Office
2309 Gravel Drive
Fort Worth, Texas 76118-6951

Section Manager
Air Pollution Control Program
City of Dallas Environmental and
Health Services
320 East Jefferson Boulevard, Room LL13
Dallas, Texas 75203-2632

LATHA KAMBHAM PH D
CONSULTANT
TRINITY CONSULTANTS
12770 MERIT DR STE 900
DALLAS TX 75251

MS CHRISTINE M OTTO CHAMBERS
MANAGING CONSULTANT
TRINITY CONSULTANTS
12770 MERIT DR STE 900
DALLAS TX 75251

bcc: Ms. Erin Selvera, Environmental Law Division, MC-173, Austin

Permit Amendment
Source Analysis & Technical Review

Company	**Building Materials Corporation of America**	Permit Number	**7711A**
City	**Dallas**	Project Number	**143272**
County	**Dallas**	Account Number	**DB-0378-S**
Project Type	**Amend**	Regulated Entity Number	**RN100788959**
Project Reviewer	**Mr. Javier Galván, P.E.**	Customer Reference Number	**CN602717464**
Site Name	**Asphalt Processing and Asphalt Roofing Manufacturing Plant**		

Project Overview

Building Materials Corporation of America dba GAF Materials Corporation (GAF) has requested several changes to its existing NSR permit, some as a result of stack testing of various facilities, through an air quality permit amendment. One hearing request from a member of the general public was submitted to the TCEQ during the first public notice comment period which was unresolved by GAF; therefore, a second public notice was performed by GAF.

There are no proposed production rate increases, physical modifications to existing facilities, or new construction of facilities associated with this permit amendment application. GAF has requested to increase asphalt throughput rates for Lines 1 and 3. On September 19, 2008 GAF entered into a proposed Agreed Order, Docket Number 2008-0805-AIR-E, to resolve deviations that resulted from stack testing. This amendment application is the result of that Agreed Order, and emission increases requested by GAF are based on the stack test results.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM_{10}	119.84	104.27	-15.57
VOC	49.39	48.05	-1.34
NO_X	34.09	22.94	-11.15
CO	31.48	65.63	34.15
SO_2	3.4	128.69	125.29

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	**April 29, 2009**
Compliance period:	**December 19, 2008 - December 19, 2003**
Site rating & classification:	**0.4/Average**
Company rating & classification:	**1.36/Average**
Has the permit changed on the basis of the compliance history or rating?	**No**

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement	
39.403	Is Public Notice Required?	**Yes**
	Date Application Received:	**December 19, 2008**
	Date Administratively Complete:	**January 14, 2009**
	Small Business Source?	**No**
	Date Leg Letters mailed:	**January 14, 2009**
39.603	Date Published:	**February 5, 2009**
	Publication Name:	***Dallas Observer***
	Pollutants:	**PM including PM_{10}, SO_2, organic compounds, CO, and NO_x**
	Date Affidavits/Copies Received:	**February 19, 2009**

Rule Citation	Requirement	
	Is bilingual notice required?	**Yes**
	Language:	**Spanish**
	Date Published:	**February 5, 2009**
	Publication Name:	***El Extra Spanish Newspaper***
	Date Affidavits/Copies Received:	**February 19, 2009**
	Date Certification of Sign Posting / Application Availability Received:	**March 13, 2009**
39.604	Public Comments Received?	**Yes**
	Hearing Requested?	**Yes (1)**
	Meeting Requested?	**No**
	Date Meeting Held:	**N/A**
	Date Response to Comments sent to OCC:	
	Request(s) withdrawn?	**No**
	Date Withdrawn:	**N/A**
	Consideration of Comments:	
	Is 2nd Public Notice required?	**Yes**
39.419	Date 2nd Public Notice Mailed:	
	Preliminary Determination:	
39.603	Date Published:	
	Publication Name:	
	Pollutants:	
	Date Affidavits/Copies Received:	
	Is bilingual notice required?	
	Language:	
	Date Published:	
	Publication Name:	
	Date Affidavits/Copies Received:	
	Date Certification of Sign Posting / Application Availability Received:	
	Public Comments Received?	
	Meeting Requested?	
	Date Meeting Held:	
	Hearing Request?	
	Date Hearing Held:	
	Request(s) withdrawn?	
	Date Withdrawn:	
	Consideration of Comments:	
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC:	
	Request for Reconsideration Received?	
	Final Action:	

Rule Citation	Requirement
	Are letters Enclosed?

Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement	
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application?	**Yes**
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	**Yes**
116.111(a)(2)(B)	Emissions will be measured using the following method:	**via recordkeeping and stack testing**
116.111(a)(2)(D)	Subject to NSPS?	**Yes**
	Subparts **A, Dc & UU**	
116.111(a)(2)(E)	Subject to NESHAP?	**No**
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories?	**Yes - area source**
	Subparts **A & AAAAAAA**	
116.111(a)(2)(H)	Is nonattainment review required?	**No**
	Is the site located in a nonattainment area?	**Yes**
	Is the site a federal major source for a nonattainment pollutant?	**No**
	Is the project a federal major source for a nonattainment pollutant by itself?	**No**
	Is the project a federal major modification for a nonattainment pollutant?	**N/A**
116.111(a)(2)(I)	Is PSD applicable?	**No**
	Is the site a federal major source (100/250 tons/yr)?	**No**
	Is the project a federal major source by itself?	**No**
	Is the project a federal major modification?	**N/A**
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	**No**
116.140 - 141	Permit Fee: $ **900.00** Fee certification:	**R911983**

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement	
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	**Yes**
	Does the site emit 10 tons or more of any single HAP?	**No**
	Does the site emit 25 tons or more of a combination?	**No**
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	**Yes**
122.10(13)(D)	Is the site a non-attainment major source?	**No**
122.602	**Periodic Monitoring (PM) applicability:**	**refer to Sp. Cnd. Nos. 7 and 9.C**
122.604	**Compliance Assurance Monitoring (CAM) applicability:**	**N/A**

Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	**4**		**none received**
City:	**Dallas**		***still waiting***
Toxicology:			

Process Description

The plant manufactures asphalt shingles for the roofing industry. A dry, nonwoven fiberglass mat is fed into the roofing machine from an unwind stand. The fiberglass is carried through the coating section where coating asphalt mixed with a stabilizer (limestone) is applied to both surfaces of the mat. The coating operation is followed by the surfacing section. Ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and itself in the finished package. The hot sheet, with a mineralized surface, then goes into the cooling section of the machine. Cooling is accomplished by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in the looper section of the machine to provide surge capacity required prior to cutting. Self-seal striping dots are then applied and the sheet is cut into shingles and automatically packaged. The boiler accepts the thermal oxidizer exhaust gas for preheating recovery and fires as necessary to meet the steam needs of the plant.

Project Description

The changes requested by GAF are as follows:

1. Increase the following permit allowables based on stack test results obtained in April, 2008:

   - PM_{10} for EPN COOL3;
   - (combined) SO_2, NO_x, and CO for EPNs 8 and 8A;
   - PM_{10} for EPN COOL1.

2. Update/correct permit representations to include on the MAERT the existence of the two sides/stacks of the waste heat recovery boiler: the waste heat recovery boiler stack (EPN 8A) and the waste heat recovery boiler natural gas burner stack (EPN WHBLR1).

3. Correct current permit representation for Tanks T-1 and T-2 Laminating Adhesive Tanks. This change in representation will not affect proposed permit allowables since the stack test on EPN 8 accounted for the routing of emissions from Tanks T-1 and T-2 to the direct-flame incinerator.

4. Decrease the following permit allowables based on stack test results:

   - PM_{10} for EPN CFL;
   - PM_{10} for EPN 25;
   - (combined) PM_{10} for EPNs 8 and 8A;
   - SO_2, NO_x, CO, PM_{10}, and VOC for EPN BLR5.

5. In addition to EPN CECO 1, remove from the NSR permit the following EPNs:

   - 98, the Rail 2 Stack;
   - HTR1, the Line 1 Stabilizer Thermal Fluid Heater Vent;
   - HTR2, the Line 1 Thermal Fluid Heater Vent;
   - 30, the Hot Oil Heater Vent (Thermal Fluid Heater).

6. Consolidate by incorporation into this permit SP Registration No. 81652.

7. Add a federally enforceable limit on the operational hours of the standby boiler (EPN BLR5). The standby boiler is used for back-up purposes only, and GAF has requested a limit of 480 hours per year.

Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]

The following are sources of emissions at the site: all heaters, the boiler and the standby boiler, all storage and process tanks, blowing stills, and all loading and unloading operations associated with trucks and railcars.

Emission Unit	Proposed Method of Control	BACT
blowing stills	direct-flame incinerator	1.2 pounds of PM per ton of asphalt blown (without a catalyst) and 0.002 pounds of VOC per ton of asphalt blown
asphalt coaters	high-energy air filters	0.004 pounds of PM per ton of asphalt roofing product manufactured and 0.034 pounds of VOC per ton of asphalt roofing product manufactured
Line 1 Cooling Section	none - vent through stacks	0.05 pounds of PM per ton of asphalt roofing product manufactured and 0.01 pound of VOC per ton of asphalt roofing product manufactured
Line 3 Cooling Section	none - vent through stacks	0.04 pounds of PM per ton of asphalt roofing product manufactured and 0.02 pound of VOC per ton of asphalt roofing product manufactured

Based on permit representations, the permit holder will be able to demonstrate compliance with current BACT and NSPS, Subpart UU, PM requirements (0.061 pounds of PM/PM_{10} per ton of blown asphalt).

NSPS Requirements

Emission Unit	Proposed Method of Control	NSPS Subpart UU Standard
asphalt storage tanks	direct-flame incinerator	zero percent opacity limitation at all times except during line blowing for cleaning
blowing stills	direct-flame incinerator	1.2 pounds of PM per ton of asphalt charged to the still during blowing w/o a catalyst
Emission Unit	**Proposed Method of Control**	**NSPS Subpart Dc Standard**
standby boiler	no abatement device - use clean fuel such as natural gas	no PM or SO_2 standards
waste heat recovery boiler (nat. gas side)	no abatement device - use clean fuel such as natural gas	no PM or SO_2 standards

Refer to the confidential file, December 19, 2008, listing the expected site-wide HAPs and respective annual emissions.

MACT Standards/Requirements

Emission Unit	Proposed Method of Control	MACT, Subpart AAAAAAA Standard
blowing stills	direct-flame incinerator	0.003 pounds of PAH per ton of asphalt charged to the blowing stills *or* 1.2 pounds of PM per ton of asphalt charged to the blowing stills
asphalt coaters	high-energy air filters	0.0002 pounds of PAH per ton of asphalt roofing product manufactured *or* 0.06 pounds of PM per ton of asphalt roofing product manufactured

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	**Yes**	Type of Modeling:	**AERMOD version 07026**
Will GLC of any air contaminant cause violation of NAAQS?			**No**
Is this a sensitive location with respect to nuisance?			**Yes - high**
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?			**Yes**

Summary of Modeling Results and Air Quality Analysis

	Averaging Period:	GLC_{max}:	SIL:	Background Conc.:	Total Conc.:	NAAQS:	TCEQ Standard:
$PM_{10}/PM_{2.5}$	24-hour	68	5	56	124	150	
	Annual	18	1	30	48	50	
NO_x	Annual	14	1	30	44	100	
CO	1-hour	622	2,000		622	40,000	
	8-hour	335	500		335	10,000	
SO_2	1-hour	676			676		1,021
	3-hour	532	25	24	556	1,300	
	24-hour	329	5	13	342	365	
	Annual	39	1	3	42	80	

	Averaging Period:	GLC_{max}:	TCEQ ESL:
Asphalt vapor	1-hour	336	350
	Annual	25	35

Total emissions were modeled for all existing EPNs. The PM_{10} NAAQS evaluation was used as a surrogate for the determination of compliance with the $PM_{2.5}$ NAAQS.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	**Yes**
Company representative(s):	**Christine M. Otto Chambers & Latha Kambham, Trinity Consultants**
Contacted Via:	**e-mail**
Date of contact:	**January 8, 2010**
Other permit(s) or permits by rule affected by this action:	**Yes**
List permit and/or PBR number(s) and actions required or taken:	**SP Registration No. 81652 will be voided upon approval of this amended NSR permit.**

Project Reviewer Date Team Leader/Section Manager/Backup Date

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates lb/hr	TPY
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO_x	0.10	0.43
		SO_2	0.01	0.01
		PM_{10}	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO_x	3.73	0.90
		SO_2	0.02	<0.01
		PM_{10}	0.28	0.07
		CO	3.13	0.75
		VOC	0.20	0.05
8/8A	Direct-flame Incinerator Exhaust Stack/Incinerator Exhaust through Waste Heat Boiler Stack	NO_x	1.90	8.31
		SO_2	29.35	128.55
		PM_{10}	2.62	11.46
		CO	11.34	49.65
		VOC	0.09	0.37

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates lb/hr	Emission Rates TPY
WHBLR1	Waste Heat Recovery Boiler, Natural Gas Burner Side	NO_x	0.47	2.06
		SO_2	0.01	0.04
		PM_{10}	0.11	0.48
		CO	1.24	5.43
		VOC	0.08	0.35
COMMON TO LINE 1 AND LINE 3				
CFL/34	Coalescing Filter Mist Elimination Systems Stack (to control emissions from the Line 1 and Line 3 Asphalt Coaters) with ESP as backup	PM_{10}	0.63	2.76
		VOC	5.76	25.23
LINE 1 OPERATION				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM_{10}	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM_{10}	0.03	0.13
1-4	Line 1 Surfacing Section Dust Collector No. 1 Stack	PM_{10}	0.59	2.58
1-5	Line 1 Surfacing Section Dust Collector No. 2 Stack	PM_{10}	0.59	2.58
1-6	Line 1 Surfacing Section Dust Collector No. 3 Stack	PM_{10}	0.59	2.58
COOL1 (total 3 stks)	Line 1 Cooling Section	PM_{10}	8.52	37.30
		VOC	1.65	7.23

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates lb/hr	TPY
LINE 3 OPERATION				
25	Sand Application Baghouse	PM_{10}	1.50	6.57
26A	Stabilizer Storage Baghouse A	PM_{10}	0.15	0.70
26B	Stabilizer Storage Baghouse B	PM_{10}	0.29	1.26
27	Stabilizer Heater Baghouse	PM_{10}	0.09	0.40
28	Asphalt Heater	NO_x	0.59	2.60
		SO_2	<0.01	0.02
		PM_{10}	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10
FUG1	Plant-wide Fugitive Emissions (4)	PM_{10}	0.91	3.97
		VOC	0.43	1.88
COOL3 (total 3 stks)	Line 3 Cooling Section	PM_{10}	6.74	29.52
		VOC	2.76	12.09
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO_x	0.60	2.58
		SO_2	0.01	0.02
		PM_{10}	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
(3) NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM_{10} - particulate matter (PM) equal to or less than 10 microns in diameter, including $PM_{2.5}$
$PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
(4) Fugitive emissions are an estimate only.

SPECIAL CONDITIONS

Permit Number 7711A

EMISSION LIMITATIONS

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. **(5/10)**

FUEL SPECIFICATIONS

2. Fuel for the facilities shall be pipeline-quality, sweet natural gas. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). **(5/10)**

3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. **(5/10)**

FEDERAL APPLICABILITY

4. Affected facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60 promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. **(5/10)**

5. Affected facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Area Sources in 40 CFR Part 63 promulgated for Asphalt Processing and Asphalt Roofing Manufacture, Subparts A and AAAAAAA. **(5/10)**

OPACITY/VISIBLE EMISSION LIMITATIONS

6. In accordance with the EPA Test Method (TM) 9 or equivalent, and except for those periods described in Title 30 Texas Administrative Code (30 TAC) §§ 101.201 and 101.211, opacity of emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) when used as a backup

control device for the filter mist systems, all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period. **(5/10)**

7. In accordance with the U.S. EPA TM 9 or equivalent, and except for those periods described in 30 TAC §§ 101.201 and 101.211, opacity of emissions from any asphalt storage tank exhaust gases discharged into the atmosphere shall not exceed 0 percent averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of emissions from any blowing still shall not exceed 0 percent averaged over a six-minute period. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent averaged over a six-minute period. **(5/10)**

8. No visible emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using the U.S. EPA TM 22 or equivalent. If this condition is violated, additional controls or process changes may be required to limit visible particulate matter (PM) emissions. Stack emissions may leave the plant property provided that opacity restrictions are not violated. **(5/10)**

OPERATIONAL LIMITATIONS, WORK PRACTICES, AND PLANT DESIGN

9. The company has represented the following to comply with all TCEQ rules and regulations:

   A. The permitted emission limits for all emission point numbers (EPN), with the exception of the Standby Boiler (EPN BLR 5), are based on 8,760 annual hours of operation. The permitted emission limits for EPN BLR 5 are based on 480 annual hours of operation. **(5/10)**

   B. All filler and backing material shall be received and transferred within the building with no visible emissions leaving the building. **(5/10)**

   C. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the direct-flame incinerator. **(5/10)**

D. Upon issuance of the amended permit, the direct-flame incinerator shall be operated at an average incineration temperature of 1450°F, based on a three-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator. **(5/10)**

E. After issuance of the amended permit, the permit holder is allowed to conduct stack sampling of the direct-flame incinerator during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the direct-flame incinerator during Normal Operations. **(5/10)**

F. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3. **(5/10)**

G. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles. **(5/10)**

10. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.

11. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.

12. The stack height of the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. The stack height of the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level. **(10/09)**

13. There shall be no changes in representations unless the permit is altered or amended. **(5/10)**

CONTINUOUS DETERMINATION OF COMPLIANCE

14. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the specified opacity limits, the holder of this permit may be required to conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowable emissions specified in the MAERT. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with applicable EPA CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(5/10)**

15. The TCEQ Executive Director may require the permit holder to perform stack sampling or ambient air monitoring to determine the opacity, rate, composition, and/or concentration of the plant's emissions. The holder of this permit may request the TCEQ Executive Director to approve alternate sampling techniques or other means to determine the opacity, rates, composition, and/or concentration of emissions in accordance with 30 TAC § 101.8. **(5/10)**

16. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions. **(5/10)**

SAMPLING REQUIREMENTS

17. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling ports and platforms shall be installed on the exhaust stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.

18. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates. **(5/10)**

19. A pretest meeting concerning any required stack sampling and/or ambient air monitoring shall be held with personnel from the appropriate TCEQ Regional Office before the required tests are performed. Air contaminants to be tested for and the test methods to be used shall be determined at this pretest meeting.

    The TCEQ Regional Office shall be notified no less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

    A. Date for pretest meeting;
    B. Date sampling will occur;
    C. Name of firm conducting sampling;
    D. Type of sampling equipment to be used; and
    E. Method or procedure to be used in sampling.

    The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

20. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO_2, NO_x, and VOC.

21. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.

22. The sampling report shall include the following: **(5/10)**

    A. Plant production and throughput rates during tests; and
    B. Direct-flame incinerator operating temperature during tests.

23. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows: **(5/10)**

    One copy to the TCEQ Dallas/Fort Worth Regional Office; and
    One copy to each appropriate local air pollution control program.

24. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Permitting and Registration, Air Permits Division.

RECORDKEEPING REQUIREMENTS

25. In addition to the recordkeeping requirements specified in General Condition No. 7, 40 CFR Part 60, Subparts A, Dc, and UU, and 40 CFR Part 63, Subparts A and AAAAAAA, the following records shall be kept and maintained on-site for a rolling 24-hour month period: **(5/10)**

    A. Records of the exhaust gas temperature immediately downstream of the direct-flame incinerator to demonstrate compliance with 30 TAC § 115.126(1)(A)(i). These records shall be maintained on-site for at least five years;

    B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4). These records shall be maintained on-site for at least five years;

    C. Hourly asphalt throughput rates for Line 1 and for Line 3;

    D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;

    E. Records of repairs and maintenance of all pollution abatement equipment; and

    F. Records of road cleaning, application of road dust control, or road maintenance for dust control.

GAF ELK MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212 Tel: 214-637-1060

April 14, 2009

Mr. David Hunter
2006 McBroom Street
Dallas, Texas 75212

Re: Air Permit Comment and Hearing Request Letter

Dear Mr. Hunter:

I am the manager of the Building Materials Corporation plant located near your home at 2006 McBroom Street in Dallas. You may know us as GAF Elk Materials. As you know, we have applied to the State of Texas for an amendment to the plant's air quality permit. The Texas Commission on Environmental Quality (TCEQ) provided me a copy of your letter expressing concerns about your health and how air emissions from our plant might impact you. As the plant manager, I am ultimately responsible for the safety of my employees and our neighbors.

Your letter prompted me to consult with my environmental team for information about our air emissions and pollution controls, and on the TCEQ permitting process and standards we must meet in order to operate. I want to share that information with you.

By way of background, our plant makes roofing shingles using asphalt which comes to us as a byproduct of refineries. This asphalt is like the asphalt used for road paving and because of its dense nature and water repellency, it is used in roofing shingles; like the shingles you or your neighbors possibly have on your houses. We blow air through the asphalt and add limestone to improve its properties, apply the asphalt to non-woven fiberglass mat, embed ceramic granules to the mat for coloring, and the back is coated with sand. The granules and sand also keep the mat from sticking together in the package. After cooling the mat with water we cut it into shingles and add some self-sealing asphalt dots before packaging it.

Obviously handling these materials and processing them results in air emissions. We are required to meet regulatory standards, monitor our processes, report emissions to TCEQ each year, operate pollution controls, and pass a health and environmental effects review from TCEQ. My environmental team employs outside experts who assist us in making these measurements, selecting the pollution controls and in evaluating the impacts of the emissions. TCEQ and EPA also review emissions data and evaluate it. If the emissions would exceed health based thresholds or environmental standards, we cannot obtain a permit.

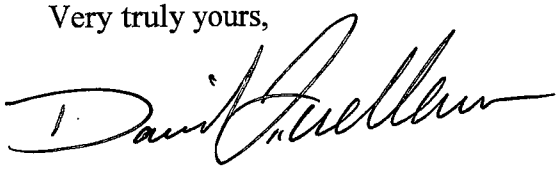
In regard to pollution controls, the plant is equipped with numerous devices and systems as well as process controls which together prevent, capture and remove contaminants. Under state and federal law, air permits must require the best available control technology. I am assured our controls meet that standard. The capital cost of these devices is well over $2,000,000 and we spend $600,000 annually to operate them and meet environmental standards.

The permit application notice you read is a response to testing information we submitted to TCEQ and which now requires us to amend our air permit. With this testing data, we are applying to revise the emission limits TCEQ set in our air permit. We are also using that test data to report our emissions to TCEQ. The data shows that the revised emission limits will comply with the health and environmental standards set by EPA and TCEQ. We expect our revised permit will require us to conduct more testing to demonstrate we comply with the permit and to report that to TCEQ, which we absolutely will do.

It is a top priority for me and our plant to ensure compliance with our revised air permit and with its additional requirements as soon as possible. To address your concerns I would like to invite you to our plant to meet me, our environmental team and our employees. It is my hope that the information I have shared, along with your first-hand inspection and confirmation, will resolve any questions you may have. The plant has been in operation for more than 50 years and over 170 employees rely on its safe operation for their jobs and health care benefits for them and their families. In doing that, we must also ensure the plant is a safe working environment for our workers and our neighbors.

Please contact me at your earliest convenience to schedule a meeting. My direct line is 214-637-8970. In my absence you may also try reaching Mr. Doug Harris at 214-637-8909, my environmental leader, for information and to schedule a tour. In the meanwhile, thank you for your interest in the environment and concern for your health and the health of our neighbors. I remain . . .

Very truly yours,



David Fuelleman
Plant Manager
Building Materials Corporation of America

Not a comment letter. Needs to be added to file.
Air Permit No.

7711 A

Brent - Sent a Copy to permit Writer.

GAF
GAF MATERIALS CORPORATION
GAF MATERIALS CORPORATION
2600 Singleton Blvd PO 655607 Dallas TX 75265-5607

IF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™

7007 0710 0001 9883 2072

UNITED STATES POSTAGE
PITNEY BOWES
02 1M
0004248061
$ 05.49⁰
APR 15 2009
MAILED FROM ZIPCODE 75212

RECEIVED
APR 17 2009
TCEQ MAIL CENTER
MM

First Class Mail

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
2009 APR 17 PM 2:56
CHIEF CLERKS OFFICE

Texas Commission On Environmental Quality
Office of the Chief Clerk MC-105
PO Box 13087
Austin, TX 78711-3087

TCEQ - Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America
Permit No.: 7711A
Notice of Intent to Obtain Permit

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §
§
COUNTY OF Dallas §

Before me, the undersigned authority, on this day personally appeared Marie Earley (*name of newspaper representative*), who being by me duly sworn, deposes and says that (s)he is the Sr. Account Executive (*title of newspaper representative*) of the Dallas Observer (*name of newspaper*); that said newspaper is generally circulated in Dallas (*in the municipality or nearest municipality to the proposed facility*), Texas; that the attached notice was published in said newspaper on the following date(s):

2/5/09

Marie Earley
(*Newspaper Representative=s Signature*)

Subscribed and sworn to before me this the 6th day of February, 2009, to certify which witness my hand and seal of office.

(Seal)

BAILEY MICHELLE DHANE
Notary Public, State of Texas
My Commission Expires
November 27, 2011

Bailey Dhane
Notary Public in and for the State of Texas

Bailey Dhane
Print or Type Name of Notary Public

My Commission Expires 11/27/11

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

AIR QUALITY PERMIT NUMBER 7711A

APPLICATION Building Materials Corporation of America, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to a Asphalt Roofing Production Facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. The facility will emit the following contaminants: particulate matter including particulate matter less than 10 microns in diameter, sulfur dioxide, organic compounds, carbon monoxide, and nitrogen oxides.

This application was submitted to the TCEQ on December 19, 2008. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Fort Worth regional office, and the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Fort Worth regional office of the TCEQ.

The TCEQ executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING **You may submit public comments, a request for a public meeting, or request a contested case hearing to the Office of the Chief Clerk at the address below.** The TCEQ will consider all public comments in developing a final decision on the application. **The deadline to submit public comments is 30 days after newspaper notice is published.**

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

If only comments are received on the application, the response to comments, along with notice of the executive director's action on the application, will be mailed to everyone who submitted comments or is on the mailing list for this application.

If a hearing request is timely filed, the executive director will complete the technical review, issue a preliminary decision on the application, and a Notice of Application and Preliminary Decision will be published and mailed to those who are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

After the final deadline for public comments following any required Notice of Application and Preliminary Decision, the executive director will consider the comments and prepare a response to all relevant and material, or significant public comments. If comments are received, the response to comments, along with the executive director's decision on the application, will then be mailed to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING **You may request a contested case hearing.** A contested case hearing is a legal proceeding similar to a civil trial in state district court. Unless a written request for a contested case hearing is filed within 30 days from this notice, the executive director may approve the application. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period and not withdrawn.

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or an association, the one or more members who have standing to request a hearing and the interests which the group or association seeks to protect, must also be identified. You may also submit your proposed adjustments to the application/ permit which would satisfy your concerns.

If a hearing request is timely filed, additional notice may be provided. Following the close of all applicable comment and request periods, the executive director will forward the application and any requests for contested case hearing to the TCEQ Commissioners for their consideration at a scheduled Commission meeting. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact relating to relevant and material air quality concerns raised during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

TO ALL INTERESTED PERSONS AND PARTIES:

Building Materials Corporation of America, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit No. 7711A, which would authorize modification to a Asphalt Roofing Production Facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. Additional information concerning this application is contained in the public notice section of this newspaper.

TCEQ - Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America
Permit No.: 7711A
Notice of Intent to Obtain Permit

CHIEF CLERKS OFFICE
2009 FEB 19 PM 3:
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §
§
COUNTY OF DALLAS §

Before me, the undersigned authority, on this day personally appeared

EMMY SILVA , who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the PUBLISHER
(title of newspaper representative)

of the EL EXTRA SPANISH NEWSPAPER ; that said newspaper is generally
(name of newspaper)

circulated in DALLAS, DALLAS COUNTY , Texas
(in the municipality or the same county as the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

FEBRUARY 05, 2009 .

Emmy Silva
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the 5th day of February, 2009, to certify which witness my hand and seal of office.

(Seal) CECILIA MALDONADO NOTARY PUBLIC STATE OF TEXAS EXPIRES 10-17-2009

Cecilia Maldonado
Notary Public in and for the State of Texas

CECILIA MALDONADO
Print or Type Name of Notary Public

My Commission Expires 10.17.09

AVISO DE RECEPCION DE SOLICITUD E INTENCION DE OBTENER PERMISO ATMOSFERICO

PERMISO NUM. 7711A DE CALIDAD ATMOSFERICA

SOLICITUD. Building Materials Corporation of America, se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A, el cual autorizará la modificación de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Tejas. La instalación existente va a emitir los siguientes contaminantes atmosféricos: particulas de materia incluyendo particulas de materia menores de 10 micras en diámetro, dioxido de azufre, compuestos organicos, monóxido de carbono y oxido de nitrógeno.

Esta solicitud se le presentó a *TCEQ* el Deciembre 19, 2008. La solicitud está disponible en la oficina central de *TCEQ*, para revisarla y sacarle copia, en la oficina regional de *TCEQ* en Fort Worth y Dallas West Library, 2332 Singleton Boulevard, Dallas, Condado de Dallas, Texas. El expediente de cumplimiento de la planta, si existe alguno, esta disponible para su revisión en la oficina regional de *TCEQ* en Fort Worth.

El director ejecutivo de *TCEQ* ha determinado que la solicitud está administrativamente completa y llevará a cabo una revisión técnica de la solicitud.

COMENTARIOS PÚBLICOS / REUNIÓN PUBLICA Usted puede presentar comentarios públicos, una petición para reunión pública, o solicitar una audiencia de caso impugnado a la Oficina del Funcionario Jefe al domicilio a continuación. *TCEQ* tomará en cuenta todos los comentarios públicos en la decisión final de la solicitud. **La fecha límite para presentar comentarios públicos es 30 días después de que se publique el aviso en el periódico.**

El propósito de la reunión pública es proporcionar la oportunidad de hacer comentarios o preguntas acerca de la solicitud. Si el director ejecutivo determina que existe un importante grado de interés público con respecto a la solicitud o si lo solicita un legislador local, se llevará a cabo una reunión pública. Una reunión pública no es una audiencia de caso impugnado.

Si solamente se reciben comentarios con respecto a la solicitud, la respuesta a los comentarios, junto con el aviso de la acción del director ejecutivo con respecto a la solicitud será enviada por correo a cualquier persona que presente comentarios o si se encuentra en la lista de correos para esta solicitud.

Si se presenta oportunamente una petición para audiencia, el director ejecutivo terminará la revisión técnica, expedirá una decisión preliminar con respecto a la solicitud, y se publicará y enviará por correo un Aviso de la Solicitud y Decisión Preliminar a aquellas personas que se encuentren en la lista de correos para esta solicitud. El aviso incluirá el plazo final para presentar comentarios públicos.

Después del plazo final para comentarios públicos y después de cualquier Aviso de Solicitud y Decisión Preliminar que se requiera, el director ejecutivo tomará en cuenta los comentarios y preparará una respuesta para todos los comentarios públicos pertinentes y materiales, o significativos. Si se recibe algún comentario, la respuesta a los comentarios, junto con la decisión del director ejecutivo con respecto a la solicitud se enviará por correo a cualquier persona que haya presentado un comentario público o que se encuentre en la lista de correos de esta solicitud.

OPORTUNIDAD PARA UNA AUDIENCIA DE CASO IMPUGNADO Usted puede solicitar una audiencia de caso impugnado. Una audiencia de caso impugnado es un procedimiento legal similar a un juicio civil en un tribunal de distrito del estado. A menos que se presente una solicitud para una audiencia de caso impugnado dentro de 30 días de esta notificación, el director ejecutivo puede autorizar la solicitud. **Si no se recibe una solicitud para audiencia dentro del período de 30 días, no se dará otra oportunidad para audiencia.** Una audiencia de caso impugnado solo se concederá con base a cuestiones debatibles de hechos que son pertinentes y materiales para las decisiones de la Comisión con respecto a la solicitud. Además, la Comisión solo concederá una audiencia sobre cuestiones que se presenten durante el período de comentarios públicos y no se retiran.

Una persona que puede estar afectada por contaminantes de emisiones atmosféricas de una planta tiene derecho a solicitar una audiencia. Si se solicita una audiencia de caso impugnado, debe presentar lo siguiente: (1) su nombre (o para un grupo o asociación, un representante oficial), dirección, número de teléfono y número de facsímile si lo tiene; 2) el nombre del solicitante y número de permiso; (3) la declaración "[yo / nosotros] solicito una audiencia de un caso impugnado"; (4) una descripción específica de como se vería adversamente afectado por la solicitud y emisiones atmosféricas de la planta de manera que no es común para el publico en general; (5) la ubicación y distancia de su propiedad con relación a la planta; y (6) una Descripción de como emplea la propiedad la cual puede ser impactada por la planta. Si la petición la hace un grupo o asociación, el miembro o miembros que tienen derecho a solicitar una audiencia y los intereses que el grupo o la asociación busca proteger, también se deben identificar. Las peticiones para una audiencia de caso impugnado se debe presentar por escrito dentro de 30 días después de este aviso a la Oficina del Funcionario Jefe, a la dirección a continuación.

Si se registra oportunamente una petición para audiencia, se dará aviso adicional. Después del cierre de todos los comentarios que aplican y los períodos de petición, el director ejecutivo enviará la solicitud y cualquier petición para una audiencia de caso impugnado a los comisionados de *TCEQ* para su consideración durante la reunión programada de la Comisión. Si se concede una audiencia, el tema de la audiencia estará limitado a casos debatibles de hecho relacionados a intereses pertinentes y materiales de calidad ATMOSFÉRICA que se hayan presentado durante el período de comentarios. Cuestiones tales como valor de la propiedad, ruido, seguridad de tráfico y zonificación no están dentro de la jurisdicción de la Comisión para abordarse en este proceso judicial.

LISTA DE CORRESPONDENCIA Aparte de presentar comentarios públicos, puede solicitar que lo / la incluyan en la lista de correos para recibir en el futuro avisos públicos para esta solicitud específica que envía por correo la Oficina del Funcionario Jefe enviando una petición por escrito a la Oficina del Funcionario Jefe de *TCEQ* a la dirección a continuación.

INFORMACIÓN Los comentarios públicos o peticiones para una reunión pública o audiencia de caso impugnado se debe presentar a la Oficina del Funcionario Jefe, MC-105, TCEQ, P.O. Box 13087, Austin, Texas 78711-3087. Para mayor información acerca de esta solicitud para permiso o el proceso para permisos, favor de llamar a la Oficina de Asistencia al Público, al 1-800-687-4040. Si requiere información general de *TCEQ* dirigirse al portal electrónico www.tceq.state.tx.us.

Se puede obtener información adicional de Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Texas 75212-3738 o al llamar Mr. Doug Harris, Plant Engineer en el (214) 637-8909.

Fecha de Expedición: Enero 14, 2009

A TODAS LAS PERSONAS Y PARTES INTERESADAS:

Building Materials Corporation of America se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar un Permiso de Calidad de Aire Núm. 7711A el cual autorizará la modificacción de un(a) la Planta de Producción de Asfalto de Material para Techar en 2600 Singleton Boulevard, Dallas, Condado de Dallas, Tejas. Información adicional sobre esta solicitud puede encontrarse en la sección de avisos públicos de esta publicación.

GAF ELK MATERIALS CORPORATION

2600 Singleton Boulevard, Dallas, TX 75212 Tel: 214-637-1060

February 16, 2009

Texas Commission on Environmental Quality
Office of the Chief Clerk, MC-105
Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Re: Public Notice Requirements
Permit Amendment Application
TCEQ Permit No.7711A
Asphalt Roofing Production Facility
Building Materials Corporation of America. – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 602717464, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 602717464, and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959.

The Dallas Plant submitted a permit amendment application (TCEQ Permit No. 7711A) to the TCEQ, dated December 18, 2008. This permit amendment application was declared administratively complete on January 14, 2009. As a part of the air permitting process, the Dallas Plant is required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. In accordance with the guidance package received from the TCEQ on January 14, 2009, the Dallas Plant has completed the following:

- Published a formal public notice on February 5, 2009 in the following newspapers circulated in Dallas, Dallas County:
  - The Dallas Observer (English)
  - El Extra (Spanish)
- Placed a copy of the permit amendment application at the Dallas West Library, 2332 Singleton Boulevard, Dallas, Texas, for public viewing and copying, beginning February 5, 2009
- Prepared and posted signs at the Dallas Plant on February 5, 2009

The Dallas Plant is required to submit original newspaper clippings showing the publication date and newspaper name to the TCEQ within 10 business days after the date of publication. The Dallas Plant is also required to submit an original affidavit of publication and alternative language affidavit of publication within 30 calendar days after the date of publication. As such, the Dallas Plant is submitting the following:

- Original newspaper clippings showing publication date and newspaper name in English and Spanish languages

- Original Affidavit of Publication in English
- Original Alternative Language Affidavit of Publication

Photocopies of these submittals are being mailed to the following, as listed on the *Notification List*:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
Mr. Mike Gould
P.O. Box 13087
Austin, Texas 78711-3087

Texas Commission on Environmental Quality
Air Section Manager
Dallas/Fort Worth Regional Office
2309 Gravel Dr
Fort Worth, Texas 76118-6951

Section Manager
Air Pollution Control Program
City of Dallas Environmental and Health Services
320 E. Jefferson Blvd, Room LL13
Dallas, Texas 75203-2632

If you have any questions, please call me at (214) 637-8909.

Sincerely,

2-16-09

Doug Harris
Plant Engineer

cc: U.S. EPA Region 6, Air Permits (6PD-R)
Mr. Mike Gould, TCEQ Office of Permitting and Registration
Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas, Air Pollution Control Program
Mr. Fred Bright, GAF
Mr. David Fuelleman, GAF

From: Origin ID: TRLA (972) 661-8100
Bree Bennett
Trinity Consultants
12770 Merit Drive
Suite 900
Dallas, TX 75251

FedEx Express

J80110981232023

Ship Date: 17FEB09
ActWgt: 1.0 LB
CAD: 2398611/INET9011
Account#: S *********

Delivery Address Bar Code

Ref # 094401.0016.0001
Invoice #
PO #
Dept #

RECEIVED
FEB 19 2009
TCEQ MAIL CENTER

SHIP TO: (512) 239-3300 BILL SENDER

Attn: Notice Team
Texas Commission on Envtl Quality
PO Box 13087
OFFICE OF THE CHIEF CLERK, MC-105
AUSTIN, TX 78711

THU - 19FEB A1

TRK# 0201 7973 4567 4688

** 2DAY **

78711
TX-US
AUS

SB AUSA

After printing this label:
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com.FedEx will not be responsible for any claim in excess of $100 per package, whether the result of loss, damage, delay, non-delivery,misdelivery,or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim.Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic valueof the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental,consequential, or special is limited to the greater of $100 or the authorized declared value. Recovery cannot exceed actual documented loss.Maximum for items of extraordinary value is $500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

RAY A CAMPBELL JR
BIOTOX INC
9130 WURZBACH RD
SAN ANTONIO TX 78240-1070

MARTIN C REAMY PRESIDENT
MCR ENGINEERING SERVICE
3921 JAMESTOWN PL
PLANO TX 75023-6026

R W CARTER
RICHARD W CARTER ASSOCIATES
PO BOX 1195
ROWLETT TX 75030-1195

MARK ROSE
THE LETCO GROUP
1901 CALIFORNIA CROSSING RD
DALLAS TX 75220-7005

CONCERNED CITIZEN
RUSSELL & RODRIGUEZ LLP
BLDG 2 STE 200
1633 WILLIAMS DR
GEORGETOWN TX 78628

TERRI WHITE SMITH
505 RIGGS CIR
MESQUITE TX 75149-5844

GLENN G DRAPER PE
DRAPER ENGINEERING
2816 HANOVER ST
DALLAS TX 75225-7924

PAUL D TAYLOR PASTOR
PLEASANT VALLEY BAPTIST CHURCH
PO BOX 850062
MESQUITE TX 75185-0062

MARIE EARLEY CITY ATTY
DALLAS OBSERVER
STE 700
2501 OAK LAWN AVE
DALLAS TX 75219-4019

CHERYL TEAMES
RJN GROUP INC
STE 400
12160 ABRAMS RD
DALLAS TX 75243-4547

BUCHANAN EASLEY
4020 SUMMIT CT
FAIRVIEW TX 75069-1183

IRVIN A UPHOFF
2532 ALDEN AVE
DALLAS TX 75211-2713

CLIFF MARTIN
EAST FORK SUD
4040 AVION DR
WYLIE TX 75098-6200

JERRY VALDEZ
PO BOX 12031
AUSTIN TX 78711-2031

LARRY MCDANIEL GENERAL MANAGER
DALLAS COUNTY PARK CITIES MUD
1811 REGAL ROW
DALLAS TX 75235-2301

MS SARAH K WALLS
CANTEY HANGER LLP
CANTEY HANGER PLAZA - STE 300
600 W 6TH ST
FORT WORTH TX 76102

BOBBY PRAYTOR
DALLAS WATER UTILITIES
1500 MARILLA DR STE 4AS
DALLAS TX 75201-6318

BRIAN G WILLIAMS WASTEWATER DIRECTOR
ROWLETT CREEK WATER REC.
2500 E CENTERVILLE RD
GARLAND TX 75040-6811

NORMAN D RADFORD
PO BOX 7650
DALLAS TX 75209-0650

Protestants SP

11/14/09

CANADIAN RIVER MUNICIPAL WATER AUTHORITY
PO BOX 9
SANFORD TX 79078-0009

DALLAS COUNTY HEALTH & HUMAN SERVICES
2377 N STEMMONS FWY
DALLAS TX 75207-2710

DALLAS COUNTY JUDGE
411 ELM ST
DALLAS TX 75202-3317

NORTH CENTRAL TEXAS COUNCIL OF GOVT
PO BOX 5888
ARLINGTON TX 76005-5888

NORTH TEXAS MUNICIPAL WATER DISTRICT
PO BOX 2408
WYLIE TX 75098-2408

US ARMY CORPS OF ENGINEERS
REGULATORY BRANCH
PO BOX 17300 CESWS-PER-R
FORT WORTH TX 76102-0300

✍ FIELD SUPERVISOR
US FISH & WILDLIFE SERVICE
711 STADIUM DR STE 252
ARLINGTON TX 76011-6247

✍ PUBLIC HEALTH REGION 2/3
TEXAS DEPARTMENT OF STATE HEALTH SERVICES
1301 S BOWEN RD STE 200
ARLINGTON TX 76013

✍ SECRETARY
GREATER DALLAS CHAMBER OF COMMERCE
700 N PEARL ST STE 1200
DALLAS TX 75201-7405

✍ TERRY HODGINS WATERSHED MGR
DALLAS WATER UTILITIES
405 LONG CREEK RD
SUNNYVALE TX 75182

✍ JAMES M OLIVER GENERAL MANAGER
TARRANT REGIONAL WATER DISTRICT
PO BOX 4508
FORT WORTH TX 76164-0508

✍ ZACHARY S THOMPSON
DALLAS COUNTY HEALTH & HUMAN SERVICES
2377 N STEMMONS FWY
DALLAS TX 75207

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2009

THE HONORABLE ROYCE WEST
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Permit Amendment Application

Dear Senator West:

Pursuant to the requirements of Section 382.0516 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, this letter is to notify you of the recent receipt of an application for a permit amendment for a facility which is located in your district. As part of the air permitting process, this applicant will be required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. The notice will inform the public of their right to ask questions, make comments, request a public hearing, or request a public meeting. This letter is being sent to you for information only and no action is required. The status of all pending air quality applications may be viewed by visiting our agency web site at www5.tceq.state.tx.us/airperm.

Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738, has applied to modify an Asphalt Roofing Production Facility located at the above facility. The Air Quality Permit Number is 7711A.

If you need further information or have any questions, please call Mr. Mike Gould at (512) 239-1097 or write him at the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald D. Nelon, Team Leader
Air Permits Initial Review Team
Air Permits Division

DDN/MG/jh

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2009

THE HONORABLE TERRI HODGE
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Permit Amendment Application

Dear Representative Hodge:

Pursuant to the requirements of Section 382.0516 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, this letter is to notify you of the recent receipt of an application for a permit amendment for a facility which is located in your district. As part of the air permitting process, this applicant will be required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. The notice will inform the public of their right to ask questions, make comments, request a public hearing, or request a public meeting. This letter is being sent to you for information only and no action is required. The status of all pending air quality applications may be viewed by visiting our agency web site at www5.tceq.state.tx.us/airperm.

Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738, has applied to modify an Asphalt Roofing Production Facility located at the above facility. The Air Quality Permit Number is 7711A.

If you need further information or have any questions, please call Mr. Mike Gould at (512) 239-1097 or write him at the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald D. Nelon, Team Leader
Air Permits Initial Review Team
Air Permits Division

DDN/MG/jh

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2009

MR DAVID FUELLERMAN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Declaration of Administrative Completeness
Permit Amendment Application
Air Quality Permit Number 7711A
Asphalt Roofing Production Facility
Dallas, Dallas County
Customer Reference Number: CN602717464
Regulated Entity Number: RN100788959

Dear Mr. Fuellerman:

The Executive Director has declared the above-referenced application, received on December 19, 2008, administratively complete on January 14, 2009.

You are now required to publish notice of your proposed activity. To help you meet the regulatory requirements associated with this notice, we have included the following items:

- Notices for Newspaper Publication (Examples A and B)
- Sign Posting Example (Example C)
- Public Notice Checklist
- Instructions for Public Notice
- Affidavit of Publication and Alternative Language Affidavit of Publication
- Notification List
- Public Notice Verification Form (Form TCEQ-20244)

Please note that it is VERY IMPORTANT that you follow ALL directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

Re: Air Quality Permit Number 7711A

If you do not comply with **all** requirements described in the instructions, further processing of your application may be suspended or the agency may take other actions. Please note that as your application undergoes the technical review, we may request additional information.

If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Ms. Joanna Hunsberger at (512) 239-1274.

Sincerely,

Donald D. Nelon, Team Leader
Air Permits Initial Review Team
Air Permits Division

DDN/jh

Enclosures

cc: Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth
Air Permits Section Chief, New Source Review, Section (6PD-R), Environmental Protection Agency, Region 6, Dallas

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

EXAMPLE A

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN AIR PERMIT

AIR QUALITY PERMIT NUMBER 7711A

APPLICATION Building Materials Corporation of America, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit Number 7711A, which would authorize modification to a Asphalt Roofing Production Facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. The facility will emit the following contaminants: particulate matter including particulate matter less than 10 microns in diameter, sulfur dioxide, organic compounds, carbon monoxide, and nitrogen oxides.

This application was submitted to the TCEQ on December 19, 2008. The application will be available for viewing and copying at the TCEQ central office, the TCEQ Fort Worth regional office, and the Dallas West Library, 2332 Singleton Boulevard, Dallas, Dallas County, Texas, beginning the first day of publication of this notice. The facility's compliance file, if any exists, is available for public review in the Fort Worth regional office of the TCEQ.

The TCEQ executive director has determined the application is administratively complete and will conduct a technical review of the application.

PUBLIC COMMENT/PUBLIC MEETING You may submit public comments, a request for a public meeting, or request a contested case hearing to the Office of the Chief Clerk at the address below. The TCEQ will consider all public comments in developing a final decision on the application. **The deadline to submit public comments is 30 days after newspaper notice is published.**

The purpose of a public meeting is to provide the opportunity to submit comments or ask questions about the application. A public meeting about the application will be held if the executive director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

If only comments are received on the application, the response to comments, along with notice of the executive director's action on the application, will be mailed to everyone who submitted comments or is on the mailing list for this application.

If a hearing request is timely filed, the executive director will complete the technical review, issue a preliminary decision on the application, and a Notice of Application and Preliminary Decision will be published and mailed to those who are on the mailing list for this application. That notice will contain the final deadline for submitting public comments.

After the final deadline for public comments following any required Notice of Application and Preliminary Decision, the executive director will consider the comments and prepare a response to all

relevant and material, or significant public comments. If comments are received, the response to comments, along with the executive director's decision on the application, will then be mailed to everyone who submitted public comments or is on a mailing list for this application.

OPPORTUNITY FOR A CONTESTED CASE HEARING **You may request a contested case hearing.** A contested case hearing is a legal proceeding similar to a civil trial in state district court. Unless a written request for a contested case hearing is filed within 30 days from this notice, the executive director may approve the application. A contested case hearing will only be granted based on disputed issues of fact that are relevant and material to the Commission's decisions on the application. Further, the Commission will only grant a hearing on issues raised by you or others during the public comment period and not withdrawn.

A person who may be affected by emissions of air contaminants from the facility is entitled to request a hearing. If requesting a contested case hearing, you must submit the following: (1) your name (or for a group or association, an official representative), mailing address, daytime phone number, and fax number, if any; (2) applicant's name and permit number; (3) the statement "[I/we] request a contested case hearing"; (4) a specific description of how you would be adversely affected by the application and air emissions from the facility in a way not common to the general public; (5) the location and distance of your property relative to the facility; and (6) a description of how you use the property which may be impacted by the facility. If the request is made by a group or an association, the one or more members who have standing to request a hearing and the interests which the group or association seeks to protect, must also be identified. You may also submit your proposed adjustments to the application/permit which would satisfy your concerns.

If a hearing request is timely filed, additional notice may be provided. Following the close of all applicable comment and request periods, the executive director will forward the application and any requests for contested case hearing to the TCEQ Commissioners for their consideration at a scheduled Commission meeting. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact relating to relevant and material air quality concerns raised during the comment period.** Issues such as property values, noise, traffic safety, and zoning are outside of the Commission's jurisdiction to address in this proceeding.

MAILING LIST In addition to submitting public comments, you may ask to be placed on a mailing list to receive future public notices for this specific application mailed by the Office of the Chief Clerk by sending a written request to the TCEQ Office of the Chief Clerk at the address below.

INFORMATION Written public comments or requests for a public meeting or contested case hearing should be submitted to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, or electronically at www.tceq.state.tx.us/about/comments.html. For more information about this permit application or the permitting process, please call the Office of Public Assistance, Toll Free, at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040. General information regarding the TCEQ can be found at www.tceq.state.tx.us.

Further information may also be obtained from Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Texas 75212-3738 or by calling Mr. Doug Harris, Plant Engineer at (214) 637-8909.

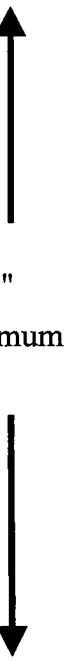
Issuance Date: January 14, 2009

EXAMPLE B

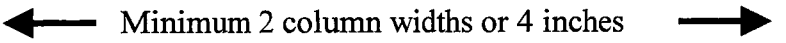
Publication Elsewhere in the Newspaper:

TO ALL INTERESTED PERSONS AND PARTIES:

Building Materials Corporation of America, has applied to the Texas Commission on Environmental Quality (TCEQ) for an amendment to Air Quality Permit No. 7711A, which would authorize modification to a Asphalt Roofing Production Facility located at 2600 Singleton Boulevard, Dallas, Dallas County, Texas. Additional information concerning this application is contained in the public notice section of this newspaper.



3" minimum

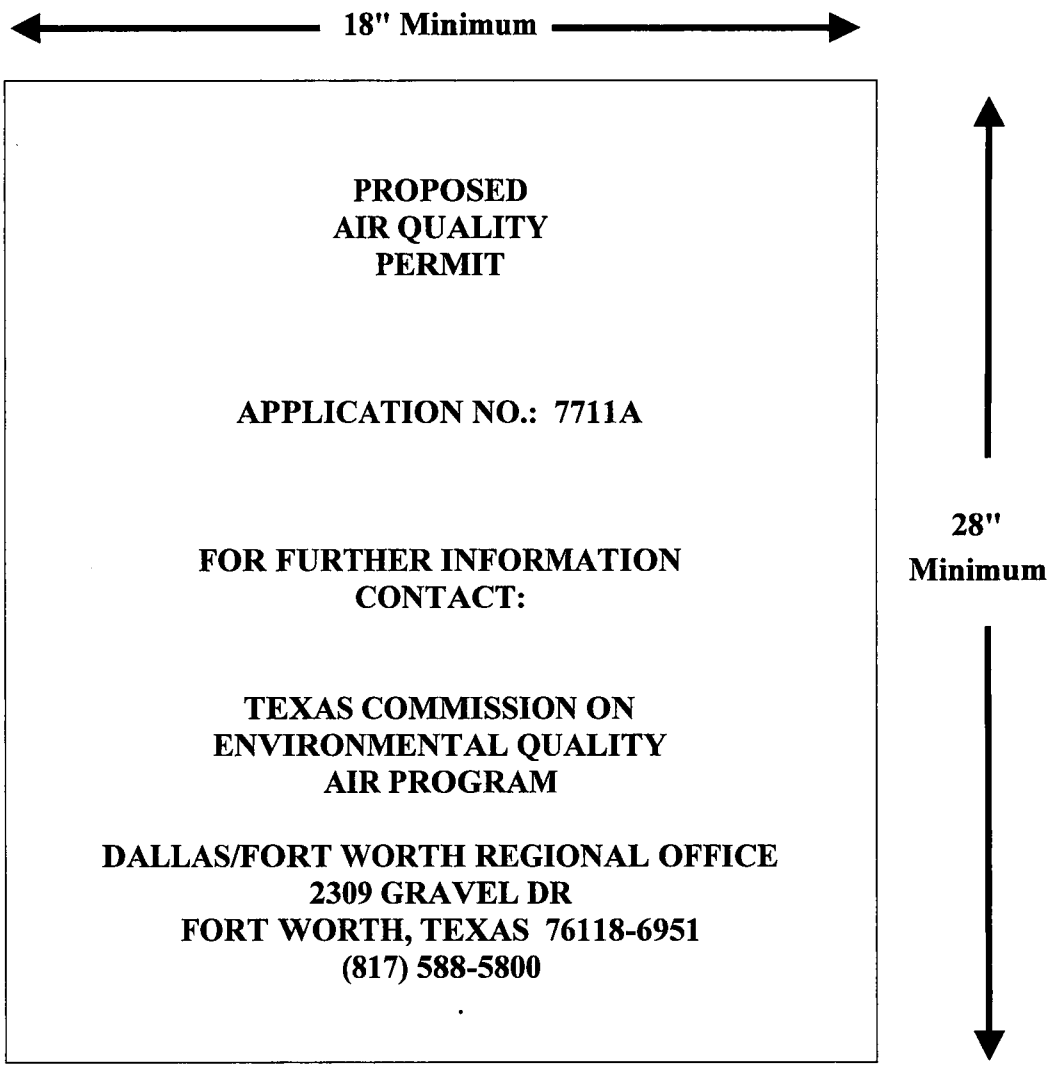


Minimum 2 column widths or 4 inches

EXAMPLE C

SIGN POSTING

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and be legible for the 30-day public comment period (which begins on the last day of newspaper publication, either English or alternate language, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a public highway, street or road. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public thoroughfare.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be 1-1/2 inch block printed capitals.

COMISIÓN DE CALIDAD AMBIENTAL DEL ESTADO DE TEXAS

EXAMPLE D

AVISO DE RECEPCIÓN DE SOLICITUD E INTENCIÓN DE OBTENER PERMISO ATMOSFÉRICO

PERMISO (*Insert the Spanish translation for the word PROPOSED which is PROPUESTO. See your English Notice to determine the appropriate wording*) NÚM. *(Insert Permit No.)* DE CALIDAD ATMOSFÉRICA

SOLICITUD. *(Insert Company Name)*, se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar (*Insert the Spanish text for one of the following: un Permiso/un Permiso Flexible*) de Calidad de Aire Núm. *(Insert Permit No.)*, el cual autorizará la modificación de un(a) *(Insert Unit Type)* en un (*Insert nature of activity/plant or site-This is to be used only if a portion of the plant is being authorized, delete otherwise)* en *(Insert Facility's Physical Location)*, *(Insert the Nearest City to Facility)*, Condado de *(Insert the County the Facility is Located)*, Tejas. La instalación (*Insert the Spanish translation for the word "proposed" which is propuesta or "existing" which is existente. See your English Notice to determine the appropriate authorization*) va a emitir los siguientes contaminantes atmosféricos: (*List criteria contaminants and speciated contaminants as required by Section guidance*).

Esta solicitud se le presentó a *TCEQ* el (*Insert the TCEQ received date*). La solicitud está disponible en la oficina central de *TCEQ,* para revisarla y sacarle copia, en la oficina regional de *TCEQ* en (*Insert the TCEQ City Name*) y *(Insert the name, address, city, and county of the public place in the county where application can be viewed)* . El expediente de cumplimiento de la planta, si existe alguno, esta disponible para su revisión en la oficina regional de *TCEQ* en (*Insert the TCEQ City Name*) .

El director ejecutivo de *TCEQ* ha determinado que la solicitud está administrativamente completa y llevará a cabo una revisión técnica de la solicitud.

COMENTARIOS PÚBLICOS / REUNIÓN PUBLICA Usted puede presentar comentarios públicos, una petición para reunión pública, o solicitar una audiencia de caso impugnado a la Oficina del Funcionario Jefe al domicilio a continuación. *TCEQ* tomará en cuenta todos los comentarios públicos en la decisión final de la solicitud. **La fecha límite para presentar comentarios públicos es 30 días después de que se publique el aviso en el periódico.**

El propósito de la reunión pública es proporcionar la oportunidad de hacer comentarios o preguntas acerca de la solicitud. Si el director ejecutivo determina que existe un importante grado de interés público con respecto a la solicitud o si lo solicita un legislador local, se llevará a cabo una reunión pública. Una reunión pública no es una audiencia de caso impugnado.
Si solamente se reciben comentarios con respecto a la solicitud, la respuesta a los comentarios, junto con el aviso de la acción del director ejecutivo con respecto a la solicitud será enviada por correo a cualquier persona que presente comentarios o si se encuentra en la lista de correos para esta solicitud.

Si se presenta oportunamente una petición para audiencia, el director ejecutivo terminará la revisión técnica, expedirá una decisión preliminar con respecto a la solicitud, y se publicará y enviará por correo un Aviso de la Solicitud y Decisión Preliminar a aquellas personas que se encuentren en la lista de correos para esta solicitud. El aviso incluirá el plazo final para presentar comentarios públicos.

Después del plazo final para comentarios públicos y después de cualquier Aviso de Solicitud y Decisión Preliminar que se requiera, el director ejecutivo tomará en cuenta los comentarios y preparará una respuesta para todos los comentarios públicos pertinentes y materiales, o significativos. Si se recibe algún comentario, la respuesta a los comentarios, junto con la decisión del director ejecutivo con respecto a la solicitud se enviará por correo a cualquier persona que haya presentado un comentario público o que se encuentre en la lista de correos de esta solicitud.

<u>OPORTUNIDAD PARA UNA AUDIENCIA DE CASO IMPUGNADO</u> **Usted puede solicitar una audiencia de caso impugnado.** Una audiencia de caso impugnado es un procedimiento legal similar a un juicio civil en un tribunal de distrito del estado. A menos que se presente una solicitud para una audiencia de caso impugnado dentro de 30 días de esta notificación, el director ejecutivo puede autorizar la solicitud. **Si no se recibe una solicitud para audiencia dentro del período de 30 días, no se dará otra oportunidad para audiencia.** Una audiencia de caso impugnado solo se concederá con base a cuestiones debatibles de hechos que son pertinentes y materiales para las decisiones de la Comisión con respecto a la solicitud. Además, la Comisión solo concederá una audiencia sobre cuestiones que se presenten durante el período de comentarios públicos y no se retiran.

Una persona que puede estar afectada por contaminantes de emisiones atmosféricas de una planta tiene derecho a solicitar una audiencia. Si se solicita una audiencia de caso impugnado, debe presentar lo siguiente: (1) su nombre (o para un grupo o asociación, un representante oficial), dirección, número de teléfono y número de facsímile si lo tiene; (2) el nombre del solicitante y número de permiso; (3) la declaración "[yo / nosotros] solicito una audiencia de un caso impugnado"; (4) una descripción específica de como se vería adversamente afectado por la solicitud y emisiones atmosféricas de la planta de manera que no es común para el publico en general; (5) la ubicación y distancia de su propiedad con relación a la planta; y (6) una Descripción de como emplea la propiedad la cual puede ser impactada por la planta. Si la petición la hace un grupo o asociación, el miembro o miembros que tienen derecho a solicitar una audiencia y los intereses que el grupo o la asociación busca proteger, también se deben

identificar. Las peticiones para una audiencia de caso impugnado se debe presentar por escrito dentro de 30 días después de este aviso a la Oficina del Funcionario Jefe, a la dirección a continuación.

Si se registra oportunamente una petición para audiencia, se dará aviso adicional. Después del cierre de todos los comentarios que aplican y los períodos de petición, el director ejecutivo enviará la solicitud y cualquier petición para una audiencia de caso impugnado a los comisionados de *TCEQ* para su consideración durante la reunión programada de la Comisión. Si se concede una audiencia, el tema de la audiencia estará limitado a casos debatibles de hecho relacionados a intereses pertinentes y materiales de calidad ATMOSFÉRICA que se hayan presentado durante el período de comentarios. Cuestiones tales como valor de la propiedad, ruido, seguridad de tráfico y zonificación no están dentro de la jurisdicción de la Comisión para abordarse en este proceso judicial.

LISTA DE CORRESPONDENCIA Aparte de presentar comentarios públicos, puede solicitar que lo / la incluyan en la lista de correos para recibir en el futuro avisos públicos para esta solicitud específica que envía por correo la Oficina del Funcionario Jefe enviando una petición por escrito a la Oficina del Funcionario Jefe de *TCEQ* a la dirección a continuación.

INFORMACIÓN Los comentarios públicos o peticiones para una reunión pública o audiencia de caso impugnado se debe presentar a la Oficina del Funcionario Jefe, MC-105, TCEQ, P.O. Box 13087, Austin, Texas 78711-3087. Para mayor información acerca de esta solicitud para permiso o el proceso para permisos, favor de llamar a la Oficina de Asistencia al Público, al 1-800-687-4040. Si requiere información general de *TCEQ* dirigirse al portal electrónico www.tceq.state.tx.us.

Se puede obtener información adicional de *(Insert Company Name, Company Address [please note this should be the company address, not the site location], City, State, Zip Code*, o al llamar *(Insert name of company's representative)* en el *(Insert representative's phone number)*.

Fecha de Expedición: _____

Example E

Publication Elsewhere in the Newspaper:

A TODAS LAS PERSONAS Y PARTES INTERESADAS:

(*Insert Company Name*) se ha registrado con la Comision de Calidad Ambiental de Texas (TCEQ o Texas Commission on Environmental Quality) para enmendar (*Insert the Spanish text for one of the following: un Permiso/un Permiso Flexible*) de Calidad de Aire Núm. *(Insert Permit No.)* el cual autorizará la modificacción de un(a) *(Insert Unit Type)* en *(Insert Facility's Physical Location)*, *(Insert the Nearest City to Facility)*, Condado de *(Insert the County the Facility is Located)*, Tejas. Información adicional sobre esta solicitud puede encontrarse en la sección de avisos públicos de esta publicación.

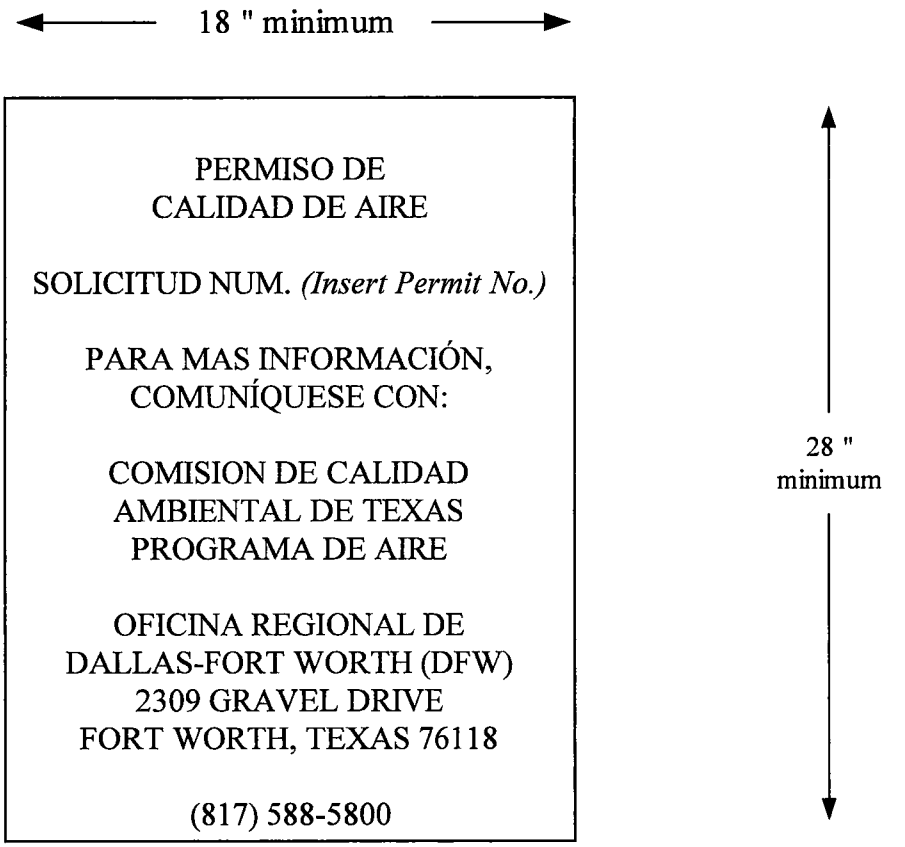
3 " minimum

Minimum 2 column widths or 4 inches

EXAMPLE F

SIGN POSTING

Sign(s) must be in place on day of publication of first newspaper notice and must remain in place and be legible for the 30-day public comment period (which begins on the last day of newspaper publication, either English or alternate language, whichever is later). Note - The information shown is an example only. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Each sign placed at the site must be located within 10 feet of each (every) property line paralleling a street or other public thoroughfare. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs shall be required along any property line paralleling a public thoroughfare.



Sign(s) must be placed at whatever height above the ground that is necessary for the sign(s) to be 100% visible from the street.

WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be 1½" block printed capitals

PUBLIC NOTICE CHECKLIST

Notice of Receipt of Application and Intent to Obtain Permit
(1st Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 30 calendar days after date of administrative completeness letter
Publish *Notice of Receipt of Application and Intent to Obtain Permit* - Example A must be published in "public notice" section of newspaper. Review for accuracy prior to publishing. - Example B must be published in prominent location (other than "public notice") in same issue of newspaper. Provide copy of application at a public place for review and copying. Keep it there until end of the designated comment period. Prepare signs.
First day of newspaper publication
Review published newspaper notice for accuracy. If errors, contact Air Permits Division. Post signs and keep them up for duration of the designated comment period. Ensure copy of application is at the public place.
Within 10 business days after date of publication
Mail original newspaper clippings showing publication date and newspaper name to Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of newspaper clippings showing publication date and newspaper name to persons listed on *Notification List*
Within 30 calendar days after date of publication
Mail original affidavit of publication and alternative language affidavit of publication (if applicable) to Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of affidavits to persons listed on *Notification List*
Within 10 business days after end of the designated comment period
Mail Public Notice Verification Form to Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Mail photocopies of Public Notice Verification Form to persons listed on *Notification List*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

INSTRUCTIONS FOR PUBLIC NOTICE
For New Source Review Air Permit

NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN PERMIT

Your application has been declared administratively complete and now you must comply with the following instructions:

Review Notice

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the Texas Commission on Environmental Quality (TCEQ) immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice or font/style without prior approval from the TCEQ.

Newspaper Notice

- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* within **30 calendar days** after the date of administrative completeness. Refer to the cover letter for the date of administrative completeness.

- You must publish the enclosed *Notice of Receipt of Application and Intent to Obtain Permit* at your expense, in a newspaper that is of general circulation in the municipality where the facility is or will be located. If the facility is not located within a municipality, the newspaper should be of general circulation in the municipality nearest to the location or proposed location.

- You must publish this notice in one issue of any applicable newspaper.

- You will find two example notices enclosed in this package. *Example A* must be published in the "public notice" section of the newspaper. *Example B* must be published in the **same issue** of the newspaper as *Example A*; however, it must be published in a prominent location (other than the public notice section). *Example B* refers the public to the "public notice" section of the newspaper where *Example A* provides more information regarding the permit application.

- *Example B* must be a total of at least **6 column inches (standard advertising units)** with a height of at least **3 inches** and a horizontal dimension of **2 column widths.** If the newspaper chosen does not use standard advertising units for measurement, the

notice must be at least **12 square inches** with the shortest side at least 3 inches.

- The bold text of the enclosed notice **must** be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice**.

Alternative Language Notice

In certain circumstances, applicants for air permits must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is required at either the elementary or middle school nearest to the facility or proposed facility location. Bilingual education programs are determined on a district-wide basis. When students who are required to attend either school are eligible to be enrolled in a bilingual education program, some alternative language notice is required (signs, or signs and newspaper notice).

- Since the school district, and not the schools, must provide the bilingual education program, these programs do not have to be located at the elementary or middle school nearest to the facility or proposed facility to trigger the alternative language notice requirement. If there are students who would normally attend the nearest schools eligible to be taught in a bilingual education program at a different location, alternative language notice is required.

- If triggered, publication of alternative language notices must be made in a newspaper or publication primarily printed in each language taught in the bilingual education program. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is or will be located.

- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.

- Publication in an alternative language section or insertion within an English language newspaper does not satisfy these requirements.

- The applicant has the burden to demonstrate compliance with these requirements. To assist applicants in meeting these requirements, the TCEQ has provided the *Public Notice Verification Form* (enclosed). You must fill out the *Public Notice Verification Form* indicating your compliance with the requirements regarding publication in an alternative language. This form is also available at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html.

- It is suggested the applicant work with the local school district to do the following:

(a) determine if a bilingual program is required in the district;
(b) determine which language is required by the bilingual program;
(c) locate the nearest elementary and middle schools; and
(d) determine if any students attending either school are eligible to be enrolled in a bilingual educational program.

- **If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language.** Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication. Electronic versions of the Spanish templates are available through the TCEQ Air Permits Division webpage at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html.

- If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

Public Comment Period

- The public comment period should last at least **30 calendar days**. With the exception of renewals whose comment period should last at least **15 calendar days**.

- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.

- The comment period for the permit may lengthen depending on whether a public meeting is held or if second notice is required. If a public meeting is held, the comment period will be extended to the later of either the date of the public meeting or the end of the second notice period.

Proof of Publication

- Check each publication to ensure that the articles were accurately published. If a notice was not published correctly you may be required to republish.

- For each newspaper in which you published, you must submit **original newspaper clippings or tear sheets** of each published notice which shows the complete notice that was published, the date of publication, and the name of the newspaper to the TCEQ Office of the Chief Clerk within **10 business days** after the date of publication.

- You must submit an **original publisher's affidavit of publication and alternate language affidavit of publication (if applicable)** to the Office of the Chief Clerk

within **30 calendar days** after the date of publication. **You must use the enclosed affidavit forms.** The affidavits must clearly identify the applicant's name and permit number. You are encouraged to submit the affidavit with the original newspaper clippings described above.

- You must submit the *Public Notice Verification Form* to the TCEQ Office of the Chief Clerk within **10 business days** of the end of this public comment period. You must use this form to certify that you have met bilingual notice requirements.

- The **original publisher's affidavits, *Public Notice Verification Form*, and original newspaper clippings of the published notices** must be mailed to:

  Texas Commission on Environmental Quality
  Office of the Chief Clerk, MC-105
  Attn: Notice Team
  P.O. Box 13087
  Austin, Texas 78711-3087

- Please ensure that the affidavit and newspaper clippings you send to the TCEQ Chief Clerk are originals and that all blanks on the affidavit are filled in correctly. Photocopies of newspaper clippings and affidavits will not be accepted.

- Photocopies of newspaper clippings, affidavits, and verifications must also be sent to those listed on the enclosed *Notification List* within the deadlines specified above.

Failure to Publish and Submit Proof of Publication

You must meet all publication requirements. **If you fail to publish the notice or submit proof of publication *on time*, then** the TCEQ may suspend further processing on your application or take other actions.

Sign Posting

Applicants for air quality permits must also post signs.

- You must post at least one sign in English and as applicable, in each alternative language.

- Signs must be in place on the first day of publication in a newspaper and must remain in place and be legible and be visible from the street for the entire duration of the publications' designated comment period.

- The sign template enclosed (*Example C*) is an example only. Read the sign template carefully and notify the TCEQ if it has an error or omissions. It is your responsibility to verify that the appropriate information pertaining to your application is accurate. Any changes to the text prepared by the TCEQ must be approved by the agency.

- Signs placed at the site must be located within 10 feet of each (every) property line paralleling a public street, road, or highway. Signs must be spaced at not more than 1,500-foot intervals. A minimum of one sign, but not more than three signs are required along any property line paralleling a public street, road, or highway. Sign(s) must be placed at a sufficient height above the ground that is necessary for sign(s) to be 100 percent visible from the street.

- All lettering on the sign must be at least **1½"** in height with block printed capital lettering. The sign must be at least **18"** wide and **28"** tall, and consist of black lettering on a white background.

- Alternative language signs are required if alternative notice is required, even if no newspaper can be found.

- Inspect each posted sign daily to ensure it is present and visible throughout the entire comment period.

- You must submit verification of sign posting using the *Public Notice Verification Form* within **10 business days** after end of the publications' designated comment period. Do not submit the *Public Notice Verification Form* verifying sign posting until after the comment period is over. You cannot certify that the sign posting is in compliance until after the comment period is over.

Application in a Public Place

- You must provide a copy of the administratively complete application at a public place for review and copying by the public. This place must be in the county in which the facility is located or proposed to be located.

- A public place is one that is publicly owned or operated. For example, libraries, county courthouses, or city halls.

- The administratively complete application must be available beginning on the first day of newspaper publication and remain available during the entire public comment period.

- If the application is submitted to the TCEQ with information marked as confidential, you are required to indicate which specific portions of the application are not being made available to the public. These portions of the application must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."

- You must submit verification of file availability using the *Public Notice Verification*

Form within **10 business days** after end of the publications' designated comment period. Do not submit the form verifying that the application was in a public place until after the comment period is complete. If a public meeting is held or second notice is required causing the public comment period to be extended, at a later date you will be required to verify that the application was in a public place during the entire public comment period.

General Information

When contacting the Commission regarding this application, please refer to the permit number at the top of the *Notice of Application and Intent to Obtain Permit.*

If you wish to obtain an electronic copy, please contact the initial reviewer who assisted in the preparation of this public notice package. The electronic version is available in Word format only and can be requested once your application has been declared administratively complete. Please ensure that the electronic version is correct and consistent with the hard copies that were provided. Any revisions made may not be accepted. You may download copies of the Public Notice Verification Form and Affidavit forms by visiting our agency web site at www.tceq.state.tx.us/permitting/air/nav/air_publicnotice.html.

If you have questions or need assistance regarding publication requirements, please contact the TCEQ Office of the Chief Clerk at (512) 239-3300 or the administrative reviewer listed in the cover letter.

TCEQ - Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America
Permit No.: 7711A
Notice of Intent to Obtain Permit

AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §
§
COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____ , who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the _____
(title of newspaper representative)

of the _____ ; that said newspaper is generally
(name of newspaper)

circulated in _____ , Texas;
(in the municipality or nearest municipality to the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

_____ .

_____
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the _____day of _____, 20_____, to certify which witness my hand and seal of office.

(Seal)

_____
Notary Public in and for the State of Texas

_____
Print or Type Name of Notary Public

My Commission Expires _____

TCEQ - Office of the Chief Clerk
MC-105 Attn: Notice Team
P.O. Box 13087
Austin, Texas 78711-3087

Applicant Name: Building Materials Corporation of America
Permit No.: 7711A
Notice of Intent to Obtain Permit

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §
§
COUNTY OF _____ §

Before me, the undersigned authority, on this day personally appeared

_____ , who being by me duly sworn,
(name of newspaper representative)

deposes and says that (s)he is the _____
(title of newspaper representative)

of the _____ ; that said newspaper is generally
(name of newspaper)

circulated in _____ , Texas
(in the municipality or the same county as the proposed facility)

that the attached notice was published in said newspaper on the following date(s):

_____ .

_____
(Newspaper Representative's Signature)

Subscribed and sworn to before me this the _____day of _____, 20_____, to certify which witness my hand and seal of office.

(Seal)

_____
Notary Public in and for the State of Texas

_____
Print or Type Name of Notary Public

My Commission Expires _____

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form
Air Permit

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

All applicants must complete all applicable portions of this form. The completed form should be sent to the TCEQ to the attention of the Office of the Chief Clerk. For more information regarding public notice, refer to the instructions in the public notice package.

ALTERNATIVE LANGUAGE CHECKLIST		
I have contacted the appropriate school district.		☐ YES ☐ NO
A bilingual education program is required by the Texas Education Code in the district.		☐ YES ☐ NO
School District:	Phone No.:	
Person Contacted:	Date:	
The name of the elementary school nearest to the proposed or existing facility is:		
The name of the middle school nearest to the proposed or existing facility is:		
The following language(s) is/are utilized in the bilingual program:		
If an applicable bilingual program exists, then applicants must publish a notice and/or post signs, as outlined in the *Instructions for Public Notice* and certify as applicable on this form.		
ALTERNATIVE LANGUAGE VERIFICATION		
I verify that the area addressed by this permit application is subject to alternative language public notice requirements.		☐ YES ☐ NO
I verify that the applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).		☐ YES ☐ NO
I verify that no such newspaper or publication was found in any of the alternative language(s) in which notice is required.		☐ YES ☐NO
I verify that the publisher of the newspapers listed below refuse to publish the notice as requested, and no other newspaper or publication in the same language and of general circulation was found in the municipality or county in which the facility is located (or proposed to be located).		☐ YES ☐ NO ☐ N/A
Newspaper:	Language:	
I verify that bilingual sign(s) required by the TCEQ were posted. *(if applicable)*		☐ YES ☐NO
I verify that original tear sheets of the newspaper alternative language notice(s) and the requested affidavits have been sent to the TCEQ.		☐ YES ☐ NO
Signed by:	Applicant:	
Title:	Date:	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Public Notice Verification Form
Air Permit

Applicant Name: Building Materials Corporation of America

Site or Facility Name: GAF Materials

TCEQ Account Number (if applicable): DB-0378-S Permit Number: 7711A

Regulated Entity Number: RN100788959 Customer Number: CN602717464

NEW SOURCE REVIEW PERMIT NOTICE VERIFICATION	
I verify that the required signs (for 1st notice) were posted in accordance with the regulations and instructions of the TCEQ	☐ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
Notice of Receipt of Application and Intent to Obtain Permit (1st Notice): I verify that a copy of the complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☐ YES ☐ NO
Notice of Application and Preliminary Decision (2nd Notice, if applicable): I verify that a copy of the complete air quality application and draft permit, and any revisions, are available for review and copying at the public place indicated below from the first day after newspaper publication; and	
I also verify that the air quality application and draft permit, and any revisions, will remain in the designated public place until either: (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing.	☐ YES ☐ NO
Name of Public Place:	
Address of Public Place:	
Signed by:	
Title:	Date:

FEDERAL OPERATING PERMIT (TITLE V) NOTICE VERIFICATION	
I verify that the required signs were posted in accordance with the regulations and instructions of the TCEQ.	☐ YES ☐ NO
I verify that original tear sheets of the newspaper notices and the requested affidavits have been furnished in accordance with the regulations and instruction of the TCEQ.	☐ YES ☐ NO
I verify that a copy of the complete air quality application and draft permit, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.	☐ YES ☐ NO
Name of Public Place:	
Address of Public Place:	
Signed by:	
Title:	Date:

NOTIFICATION LIST

It is the responsibility of the applicant to furnish the following offices with copies of the notices published, the *Affidavits of Publication*, the *Alternative Language Affidavit of Publication (if applicable)*, and a completed copy of the *Public Notice Verification Form.* Originals should be sent to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. **Copies** should be sent to the following:

U.S. Environmental Protection Agency
Region 6
Attn: Air Permits (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Texas Commission on Environmental Quality
Air Section Manager
Dallas/Fort Worth Regional Office
2309 Gravel Dr
Fort Worth, Texas 76118-6951

Section Manager
Air Pollution Control Program
City of Dallas Environmental and Health Services
320 E. Jefferson Blvd, Room LL13
Dallas, Texas 75203-2632

Texas Commission on Environmental Quality
Office of Permitting and Registration
Air Permits Division, MC-163
Mr. Mike Gould
P.O. Box 13087
Austin, Texas 78711-3087

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2009

THE HONORABLE ROYCE WEST
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Permit Amendment Application

Dear Senator West:

Pursuant to the requirements of Section 382.0516 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, this letter is to notify you of the recent receipt of an application for a permit amendment for a facility which is located in your district. As part of the air permitting process, this applicant will be required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. The notice will inform the public of their right to ask questions, make comments, request a public hearing, or request a public meeting. This letter is being sent to you for information only and no action is required. The status of all pending air quality applications may be viewed by visiting our agency web site at www5.tceq.state.tx.us/airperm.

Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738, has applied to modify an Asphalt Roofing Production Facility located at the above facility. The Air Quality Permit Number is 7711A.

If you need further information or have any questions, please call Mr. Mike Gould at (512) 239-1097 or write him at the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald D. Nelon, Team Leader
Air Permits Initial Review Team
Air Permits Division

DDN/MG/jh

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 14, 2009

THE HONORABLE TERRI HODGE
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Permit Amendment Application

Dear Representative Hodge:

Pursuant to the requirements of Section 382.0516 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, this letter is to notify you of the recent receipt of an application for a permit amendment for a facility which is located in your district. As part of the air permitting process, this applicant will be required to publish a formal public notice in a newspaper of general circulation in the municipality nearest to the facility location. The notice will inform the public of their right to ask questions, make comments, request a public hearing, or request a public meeting. This letter is being sent to you for information only and no action is required. The status of all pending air quality applications may be viewed by visiting our agency web site at www5.tceq.state.tx.us/airperm.

Building Materials Corporation of America, 2600 Singleton Boulevard, Dallas, Dallas County, Texas 75212-3738, has applied to modify an Asphalt Roofing Production Facility located at the above facility. The Air Quality Permit Number is 7711A.

If you need further information or have any questions, please call Mr. Mike Gould at (512) 239-1097 or write him at the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald D. Nelon, Team Leader
Air Permits Initial Review Team
Air Permits Division

DDN/MG/jh

bcc: Ms. Charlene Smith, Notice Team, Office of Chief Clerk, Austin
Mr. Mike Gould, Air Permits Division, Austin

APPLICANT & CONTACT INFORMATION

This sheet should accompany all notices to be processed by the office of the chief clerk on the right side of the file folder.

APPLICANT'S MAIN CONTACT & ADDRESS TO BE SHOWN ON PERMIT:	
NAME/TITLE: David Fuellerman, Plant Manager	
COMPANY: Building Materials Corporation of America	
STREET/ROAD: 2600 Singleton Boulevard	
CITY/STATE/ZIP: Dallas, Texas 75212-3738	
TELEPHONE: (214) 637-1060	**FAX:** (214) 637-5202
APPLICANT'S TECHNICAL REPRESENTATIVE/ CONSULTANT:	
NAME/TITLE: Doug Harris, Plant Engineer	
COMPANY: Building Materials Corporation of America	
STREET/ROAD: 2600 Singleton Boulevard	
CITY/STATE/ZIP: Dallas, TX 75212-3738	
PHONE: (214) 637-8909	**FAX:** (214) 637-5202
PERSON RESPONSIBLE FOR PUBLISHING NOTICE:	
NAME/TITLE: Doug Harris, Plant Engineer	
COMPANY: Building Materials Corporation of America	
STREET/ROAD: 2600 Singleton Boulevard	
CITY/STATE/ZIP: Dallas, Texas 75212-3738	
TELEPHONE: (214) 637-1060	**FAX:** (214) 637-5202

ALL DOCUMENTS BEHIND THIS PAGE ARE FOR YEAR 2009

2009 BEHIND THIS PAGE

Alex. B

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 26, 2009

MR DOUG HARRIS
PLANT ENGINEER
GAF ELK MATERIALS CORPORATION
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Alteration
Permit Number: 7711A
Asphalt Roofing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN602717464
Account Number: DB-0378-S

Dear Mr. Harris:

This is in response to your letter received October 24, 2008, requesting alteration of the maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand that you wish to lower the emissions of volatile organic compounds (VOCs) from emission points Line 1 Cooling Section and Line 3 Cooling Section. We also understand that the testing you have performed on these emission points has shown that the emissions of VOCs are lower than those listed in your permit MAERT.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 7711A is altered. Enclosed is the altered MAERT to replace the one currently attached to your permit. Please attach it to your permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following website:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

Re: Permit Number 7711A

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Alex Berksan, P.E., at (512) 239-1595 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Richard A. Hyde, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

RAH/AB/pg

Enclosure

cc: Mr. Christine M. Chambers, Managing Consultant, Trinity Consultants, Dallas
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 141918

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 7711A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

		AIR CONTAMINANTS DATA		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
STILLYARD OPERATION				
HTR3	T-1 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
CECO1	T-1 and T-2 Laminating Adhesive Tanks CECO Filter Vent	VOC	0.03	0.17
		PM_{10}	0.01	0.02
HTR4	T-2 Laminating Adhesive Bulk Storage Tank Heater Vent	NO_x	0.05	0.22
		SO_2	0.01	0.01
		PM_{10}	0.01	0.02
		CO	0.04	0.18
		VOC	0.01	0.01
HTR 5	Asphalt Heater for T-14 and T-15 Coating Asphalt Storage Tank and Coating Asphalt Loop Feed Tank	NO_x	0.10	0.43
		SO_2	0.01	0.01
		PM_{10}	0.01	0.03
		CO	0.08	0.36
		VOC	0.01	0.02
BLR5	Standby Boiler Vent	NO_x	3.73	16.34
		SO_2	0.02	0.09
		PM_{10}	0.28	1.23
		CO	3.13	13.71
		VOC	0.21	0.92

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
8	Boiler and Thermal Oxidizer Vent Controlling Tanks T-8, T-9, T-10, T-14, T-15, T-110, T-120, and Blowstills T-13 and T-26	NO_x	0.72	3.16
		SO_2	0.73	3.18
		PM_{10}	5.00	21.90
		CO	1.26	5.53
		VOC	0.09	0.37
COMMON TO LINE 1 AND LINE 3				
34	Electrostatic Precipitator (for Line 1 and 3) Stack	VOC	5.76	25.23
		PM_{10}	3.43	15.02
98	Rail 2 Stack	PM_{10}	4.63	4.59
		VOC	0.51	0.51
LINE NO. 1 OPERATION				
1-1	Line 1 Stabilizer Storage and Heater Baghouse Stack	PM_{10}	0.23	1.01
1-3	Line 1 Stabilizer Use Bin Baghouse Stack	PM_{10}	0.03	0.13
1-4	Line 1 (Surfacing Section) Dust Collector Stack No. 1	PM_{10}	0.59	2.58
1-5	Line 1 (Surfacing Section) Dust Collector Stack No. 2	PM_{10}	0.59	2.58
1-6	Line 1 (Surfacing Section) Dust Collector Stack No. 3	PM_{10}	0.59	2.58

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
HTR1	Line 1 Stabilizer Thermal Fluid Heater Vent	NO_x	0.20	0.86
		SO_2	0.01	0.01
		PM_{10}	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
HTR2	Line 1 Thermal Fluid Heater Vent	NO_x	0.20	0.86
		SO_2	0.01	0.01
		PM_{10}	0.02	0.07
		CO	0.17	0.72
		VOC	0.01	0.05
COOL1(total 3 stks)	Line No. 1 Cooling Section Exhaust	VOC	1.65	7.23
		PM_{10}	4.00	17.52
LINE 3 OPERATION				
25	Sand Application Baghouse Stack	PM_{10}	3.86	16.91
26A	Stabilizer Storage Baghouse Stack	PM_{10}	0.15	0.70
26B	Stabilizer Storage Baghouse Stack	PM_{10}	0.29	1.26
27	Stabilizer Heater Baghouse Stack	PM_{10}	0.09	0.40
28	Asphalt Heater Vent	NO_x	0.59	2.60
		SO_2	<0.01	0.02
		PM_{10}	0.04	0.20
		CO	0.50	2.20
		VOC	0.03	0.10

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates * lb/hr	TPY**
30	Hot Oil Heater Vent (Thermal Fluid Heater)	NO_x	0.27	1.20
		SO_2	<0.01	0.01
		PM_{10}	0.02	0.10
		CO	0.23	1.00
		VOC	0.01	0.04
FUG1	Plantwide Fugitive Emissions (4)	VOC	0.43	1.88
		PM_{10}	0.91	3.97
COOL3 (total 3 stks)	Line 3 Cooling Section (3 Exhaust) Fumes from Asphalt Coater	VOC	2.76	12.09
		PM_{10}	6.00	26.30
HTR6	Line 3 Stabilizer Thermal Fluid Heater Vent	NO_x	0.60	2.58
		SO_2	<0.01	0.02
		PM_{10}	0.05	0.20
		CO	0.49	2.16
		VOC	0.03	0.14

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
(3) NO_x - total oxides of nitrogen
SO_2 - sulfur dioxide
PM_{10} - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
CO - carbon monoxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
(4) Fugitive emissions are an estimate only.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

_24_ Hrs/day _7_ Days/week _52_ Weeks/year or _8,760_ Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.

Maximum allowable Asphalt Throughput Rate: Line 1 at 24,886 lbs/hour
Line 3 at 41,472 lbs/hour

Maximum Allowable Production Rate (Line 1 plus Line 3): 171 tons/hour of finished shingles
1,498,000 tons/year of finished shingles

Dated January 26, 2009

Permit Alteration
Source Analysis & Technical Review

Company	**Building Materials Corporation Of America**	Permit Number	**7711A**
City	**Dallas**	Project Number	**141918**
County	**Dallas**	Account Number	**DB-0378-S**
Project Type	**Revision**	Regulated Entity Number	**RN100788959**
Project Reviewer	**Alex Berksan, P.E.**	Customer Reference Number	**CN602717464**
Site Name	**Asphalt Roofing Facility**		

Project Overview

Building Materials Corp. of America (BMCA) requested a revision of their maximum allowable emission rates table to reflect the results of VOC testing that they have performed.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM			0.00
PM_{10}			0.00
$PM_{2.5}$			0.00
VOC	54.03	48.82	-5.21
NO_X			0.00
CO			0.00
SO_2			0.00
HAPs			0.00

Review Summary

The initial determination of compliance condition of this permit required testing of Line 1 Cooling Section and Line 3 Cooling Section to demonstrate compliance with allowable emissions listed in the MAERT. BMCA has conducted these tests and the results show that VOC emissions from these 2 sources are lower than the MAERT. VOC emissions from EPNs COOL1 and COOL3 have been revised and the net result is a 5.21 ton/year decrease in emissions. Permit special conditions remain unchanged.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	**Yes**
Company representative(s):	**Christine Otto Chambers, Trinity Consultants**
Contacted Via:	**Email**
Date of contact:	**1/9/2009**
Other permit(s) or permits by rule affected by this action:	**No**
List permit and/or PBR number(s) and actions required or taken:	**NA**

Alex Berksan 1/21/09 Michael Ladd 1/22/2009

Project Reviewer Date Team Leader/Section Manager/Backup Date